

RCRA INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IX
HAZARDOUS WASTE MANAGEMENT DIVISION
WASTE COMPLIANCE BRANCH

Purpose: RCRA Compliance Inspection

Facility: General Chemical Corporation
525 Castro Street
Richmond, CA 94802

EPA ID Number: CAD028981967

Date of Inspection: April 26, 1993

EPA Inspector: Maria Kelly
Environmental Protection Specialist
(415) 744-2150

Department of Toxics Natalie Marcanio
Substance Control Environmental Specialist
Inspector: (510) 540-3891

Contra Costa County James Hattum
Health Services Dept. Hazardous Materials Specialist
Inspector: (510) 646-2286

Facility Representatives: Robert Jewett
Plant Manager
(510) 232-7193

Al Stoner
Operations Supervisor
(510) 232-7193

Martha Murray
Manager, Environmental Health and Safety
(510) 458-7338

Carolyn Lown
Attorney
(415) 433-1950

Michael Herman
Associate General Counsel
(201) 515-2461

Report Writer: Maria Kelly
Environmental Protection Specialist

Date of Report: July 1993

RCRA INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY
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INTRODUCTION

General Chemical Corporation (General Chemical) is a sulfuric acid manufacturing plant located in Richmond, CA. The facility began operating in 1944 as a subsidiary of Allied Chemical Corporation and functioned as a sulfuric acid servicing facility for Standard Oil of California Refinery, also known as Chevron USA Refinery, a neighboring facility. In 1986, General Chemical Corporation split from the parent company, Allied Chemical Corporation. General Chemical operates on seven acres of the 44 acre property and is open 24 hours a day, seven days a week. The facility employs 34 people.

General Chemical produces high quality and specialty blends of sulfuric acid from spent sulfuric acid which is piped from Chevron USA Refinery. Spent sulfuric acid that is used to produce virgin sulfuric acid is excluded from RCRA regulation as a material which is not a waste under 22 CCR 66261.4(a)(3), unless it is being accumulated speculatively. The sulfuric acid recycling process involves burning elemental sulfur and spent alkylation acid to form sulfur dioxide gas. The sulfur dioxide gas reacts with oxygen in converters to form sulfur trioxide which is then hydrated in absorption towers to form sulfuric acid. The sulfuric acid is cooled and stored in one of ten sulfuric acid tanks in preparation for shipment. Approximately one-third of the plant's product is piped back to the refinery in an above-ground pipeline. The remainder is used by detergent, alum, fertilizer and automobile battery manufacturers, as well as General Chemical's Bay Point electronic chemical facility.

RCRA STATUS

Allied Chemical Corporation, Richmond Works, as parent company to General Chemical, notified EPA of hazardous waste activity on August 5, 1980 (Attachment A). General Chemical's Notification included, but was not limited to, the following listed RCRA-regulated hazardous wastes: acetone (I) (EPA Waste Code U002), lead acetate (EPA Waste Code U144), 1-1-1 trichloroethane (EPA Waste Code U226), and mercury (EPA Waste Code U151), as well as wastes exhibiting characteristics for corrosivity.

would be photographed and Mr. Jewett responded that no photographs could be taken unless General Chemical developed the film for EPA. When Ms. Lown joined the inspection party, she cited confidential business information as the reason for the no photograph "policy". EPA did not pursue the right to obtain photographic evidence since no potential violations were noted by the inspectors during the physical inspection.

The Process

As stated previously, alkylation acid, sulfur, and natural gas or soluble organic compound found in the spent acid are combined in a decomposition chamber to form sulfur dioxide gas. The sulfur dioxide gas is heated in one of two boilers. Steam escapes into the atmosphere while the sulfur dioxide gas is cooled in gas cooling towers (Attachment C).

Flyash (EPA Waste Code D002, D006, D007, D008) is generated in two boilers which are each attached to a decomposition chamber. The flyash is a residual resulting from decomposing acid which has built up within the boiler tubes. Hoppers are connected to the boilers and flyash is then collected into waste drums from the hoppers.

The flyash is drummed as a hazardous waste and transferred to the main accumulation area. Because the flyash contains very small quantities of hazardous constituents (Attachment D, Waste Profile Sheet), it is recycled and reused in the manufacture of sulfuric acid. The flyash contains small amounts of iron, chrome and nickel sulfate. All of the heavy metal constituents are found in quantities of less than 10 ppm (Attachment D).

The flyash is mixed with water and recycled with the sulphur dioxide gas after it exits the gas cooling tower (Attachment C).

Main Accumulation Area

There were seven drums of flyash located in the main accumulation area. All of the drums were labelled in accordance with 22 CCR §66262.34. The EPA Waste Codes for the flyash were recorded on the waste drum labels as D002, D006, D007, D008 (wastes that exhibit characteristics for corrosivity and toxicity for cadmium, chromium and lead). Four of the hazardous waste drums had an accumulation start date of 3/1/93 and three of the hazardous waste drums had an accumulation start date of 3/22/93. The accumulation area is located on a concrete pad. Mr. Jewett stated that the facility has not disposed of flyash since 1992.

Lube Oil Storage Shed - Satellite Accumulation Area

There were two empty drums in this area, one with the word "Solvents" written on it and the other with the word "Waste Oil" written on it. Solvents are generated from parts cleaning. Approximately one 55-gallon drum of solvents is generated each quarter.

Evergreen Environmental Services collects the waste oil that accumulates in one 55-gallon drum located in the shed. The waste oil does not remain in the shed for greater than 90 days. An employee named Ken Taylor who was not present is responsible for monitoring the solvent and waste oil drums.

According to Mr. Jewett, the facility officially stopped burning its waste oil on-site in December 1991 because the heavy metal constituent levels were too high under California regulations.

NPDES Permit

General Chemical does not have an NPDES permit of its own but is tied into Chevron USA Refinery's permit. General Chemical's storm water runoff is collected in a storm drain which flows into four effluent tanks. The pH level of the storm water is neutralized to a pH level of 6 in accordance with Chevron's requirements (a pH level of 2 is the "legal requirement" according to Mr. Jewett). The neutralizing agent, sodium hydroxide, is pumped into the four tanks from another tank. The neutralized storm water runoff is then piped to Chevron USA Refinery and discharged into the POTW in Richmond.

Record Review

Contingency Plan

The facility's Contingency Plan (Attachment E) was not adequate. While the addresses and telephone numbers of local agencies, the police department, the hospital, and the fire department were listed in the Contingency Plan, some of the information was as old as 3 years (e.g., the US Environmental Protection Agency, Region 9 address was listed as 215 Fremont Street). Mr. Jewett stated the Contingency Plan is updated as necessary and the last update occurred in January.

Mr. Jewett is considered the primary emergency coordinator and Al Stoner, the Operations Supervisor, is considered the secondary emergency coordinator. If neither Mr. Jewett nor Mr.

Stoner is on-site, the lead person on the shift assumes emergency coordination responsibilities.

Training

Each employee handling hazardous materials is provided with introductory, refresher and on-the-job training. The facility retains a list of employees attending each training class. Each employee's training record lists the training required for his/her job and the training that he/she has completed (Attachment F).

Employees are trained in safety and emergency response procedures within six months of hire. Refresher training is provided annually.

Biennial Report

The hazardous wastes listed in the 1991 Hazardous Waste Report (Attachment G) included 14.6 tons of Flyash (EPA Waste Code D007) which were disposed of at a treatment, storage, and disposal facility (TSDF), 220 gallons of Spent Solvent (EPA Waste Codes D001 and D003), and lab packs of old laboratory chemicals with EPA Waste Codes D030 (2,4 Dinitrotoluene) and P098 (Potassium Cyanide), which was mistyped as D098.

Manifests

The facility's manifests appeared to be completed adequately (samples, Attachment H). Land disposal restriction forms were kept on-site for applicable manifests for at least five years in accordance with 22 CCR §66268.7(a)(6).

In the past, several manifests have contained discrepancies which were either noted for correction by General Chemical or by the receiving TSDF (Sample, Attachment I).

POTENTIAL VIOLATIONS

22 CCR §66265.52(d)

Names and home telephone numbers of emergency coordinators are listed in the facility's Contingency Plan, however, addresses and office telephone numbers are not (GOR, Class II).

22 CCR §66265.54(d)

Robert Jewett, the Plant Manager, is considered General Chemical's Primary Emergency Coordinator, however, in the Contingency Plan he is listed as the Secondary Emergency Coordinator. The Contingency Plan has not been amended in accordance with this regulation which requires that the plan be amended when emergency coordination responsibilities have changed (GOR, Class II).

Suggestions:

Sulfur staining on the ground was observed throughout the facility. Leaks from trucks transporting sulfuric acid and other sources of spills should be minimized.

ATTACHMENTS

- A. Notification of Hazardous Waste Activity
- B. Notification of Hazardous Waste Site
- C. Process Diagram
- D. Waste Profile Sheet of Flyash (EPA Waste Codes D002, D006, D007, D008)
- E. Emergency Coordinator Listing and Emergency Notification Listing
- F. Sample: Training Checklist and Certificate of Training
- G. 1991 Hazardous Waste Report (Biennial Report)
- H. Sample Manifests: #90053440 and #89941255
- I. Manifest Discrepancy Letter
- J. Hazardous Waste Log for 1992
- K. Inventory of Hazardous Materials
- L. Model Multi-Media Screening Checklist
- M. Generator Checklist

ATTACHMENT A

W	C	A	D	0	2	8	9	8	1	9	6	7	2	1
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U 0 0 2	U 2 2 6	U 1 9 6		P 0 1 8	U 1 2 2
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
U 1 4 4	U 1 5 1	U 1 8 8	P 0 9 8		
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)

☒ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (type or print)

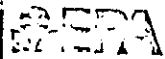
DATE SIGNED

PLANT MANAGER

5 AUG 1980

EPA Form 8700-12 (6-80) REVERSE

Many of the commercial chemical products listed in IX. C. are laboratory stock or manufactured products and are not normally discarded.



U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprint label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means: single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

INSTALLATION'S EPA I.D. NO.

CAD028981967

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

PO BOX 1712
RICHMOND, CA 94802

III. LOCATION OF INSTALLATION

525 CASTRO STREET
RICHMOND, CA 94802

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED
(yr., mo., & day)

I. NAME OF INSTALLATION

ALLIED CHEMICAL CORP. RICHMOND WORKS

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 BOX 1712

CITY OR TOWN

4 RICHMOND

ST.

ZIP CODE

CA 94802

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 525 CASTRO STREET

CITY OR TOWN

6 RICHMOND

ST.

ZIP CODE

CA 94802

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

7 BORGHI HENRY PLANT MANAGER

PHONE NO. (area code & no.)

415-232-7193

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 ALLIED CHEMICAL CORPORATION

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)

F = FEDERAL
M = NON-FEDERAL

N

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION

☐ B. TRANSPORTATION (complete Item VII)

☒ C. TREAT/STORE/DISPOSE

☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR

☐ B. RAIL

☐ C. HIGHWAY

☐ D. WATER

☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION

☐ B. SUBSEQUENT NOTIFICATION (complete Item C)

C. INSTALLATION'S EPA I.D. NO.

CAD028981967

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

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23 - 24	23 - 24	23 - 24	23 - 24	23 - 24	23 - 24
7	8	9	10	11	12
23 - 24	23 - 24	23 - 24	23 - 24	23 - 24	23 - 24

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23 - 24	23 - 24	23 - 24	23 - 24	23 - 24	23 - 24
19	20	21	22	23	24
23 - 24	23 - 24	23 - 24	23 - 24	23 - 24	23 - 24
25	26	27	28	29	30
23 - 24	23 - 24	23 - 24	23 - 24	23 - 24	23 - 24

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31	32	33	34	35	36
U 0 0 2	U 2 2 6	U 1 9 6	P 1 2 0	P 0 1 8	U 1 2 2
23 - 24	23 - 24	23 - 24	23 - 24	23 - 24	23 - 24
37	38	39	40	41	42
U 1 4 4	U 1 5 1	U 1 8 8	P 0 9 8		
23 - 24	23 - 24	23 - 24	23 - 24	23 - 24	23 - 24
43	44	45	46	47	48
23 - 24	23 - 24	23 - 24	23 - 24	23 - 24	23 - 24

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49	50	51	52	53	54
23 - 24	23 - 24	23 - 24	23 - 24	23 - 24	23 - 24

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE (D001) ☒ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE <i>[Signature]</i>	NAME & OFFICIAL TITLE (type or print) PLANT MANAGER	DATE SIGNED 5 AUG 1980
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EPA Form 8700-12 (6-80) REVERSE

Signature *[Signature]*

Amended date: 1/27/80

Many of the commercial chemical products listed in IX. C. are laboratory stock or manufactured products and are not normally discarded.

Amendments made in accordance with 40 CFR Part 261.33, dated November 25, 1980.

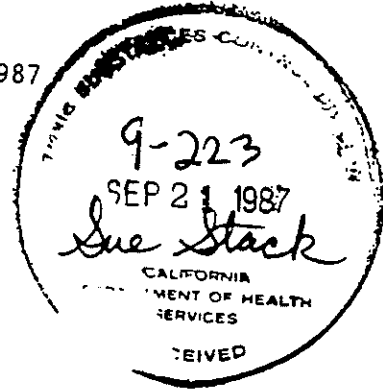
ATTACHMENT B

Environmental Matters
P.O. Box 389
Parsippany, NJ 07054-0389
(201) 515-0900

**General
Chemical**

September 18, 1987

Mr. Harry Seraydarian, Director
Toxics and Waste Management Division
ENVIRONMENTAL PROTECTION AGENCY
Regional IX Office
215 Fremont Street
San Francisco, California 94105



Dear Mr. Seraydarian:

Pursuant to the requirements set forth in Section 103(c) of the Comprehensive Environmental Response Compensation and Liability Act of 1980, enclosed you will find an amended Notification of Hazardous Waste Site form for the General Chemical Corporation facility located in Richmond, California. This notification amends the original notification which was submitted to the Environmental Protection Agency on June 3, 1981. Also enclosed, you will find a copy of the original notification for your information.

This amended notification was necessitated by the discovery of an acidic sludge which was disposed of on-site. Visual and analytical evidence of this disposal has only recently been confirmed.

If you have any questions on the notification, or require additional information, please contact me at (201) 515-1841.

Sincerely yours,

GENERAL CHEMICAL CORPORATION

E. J. Shields
Director of Environmental Matters

EJS:km/084
Attachments

cc: California Department of Health Services
California Regional Water Quality Control Board

Notification of Hazardous Waste Site

United States
Environmental Protection
Agency
Washington DC 20460

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1981.

Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

Person Required to Notify:

Enter the name and address of the person or organization required to notify.

Name General Chemical Corporation
Street 90 East Halsey Road
City Parsippany State N.J. Zip Code 07054

Site Location:

Enter the common name (if known) and actual location of the site.

Name of Site Richmond Works
Street 525 Castro Street, P.O. Box 1712
City Richmond County Contra Costa State CAL. Zip Code 94802

Person to Contact:

Enter the name, title (if applicable), and business telephone number of the person to contact regarding information submitted on this form.

Name (Last, First and Title) Shields, Edward J. Director, Environmental Matters
Phone (201) 515-1838

Dates of Waste Handling:

Enter the years that you estimate waste treatment, storage, or disposal began and ended at the site.

From (Year) ~1969 To (Year) ~1969

For the Waste described in this Amendment to the initial notification.

Waste Type: Choose the option you prefer to complete

Option 1: Select general waste types and source categories. If you do not know the general waste types or sources, you are encouraged to describe the site in Item I—Description of Site.

General Type of Waste:
Place an X in the appropriate boxes. The categories listed overlap. Check each applicable category.

1. ☒ Organics
2. ☐ Inorganics
3. ☐ Solvents
4. ☐ Pesticides
5. ☐ Heavy metals
6. ☐ Acids
7. ☐ Bases
8. ☐ PCBs
9. ☐ Mixed Municipal Waste
10. ☐ Unknown
11. ☐ Other (Specify)

Source of Waste:
Place an X in the appropriate boxes.

1. ☐ Mining
2. ☐ Construction
3. ☐ Textiles
4. ☐ Fertilizer
5. ☐ Paper/Printing
6. ☐ Leather Tanning
7. ☐ Iron/Steel Foundry
8. ☒ Chemical, General
9. ☐ Plating/Polishing
10. ☐ Military/Ammunition
11. ☐ Electrical Conductors
12. ☐ Transformers
13. ☐ Utility Companies
14. ☐ Sanitary/Refuse
15. ☐ Photofinish
16. ☐ Lab/Hospital
17. ☐ Unknown
18. ☐ Other (Specify)

Option 2: This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 regulations (40 CFR Part 261).

Specific Type of Waste:

EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter the appropriate four-digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by contacting the EPA Region serving the State in which the site is located.

Waste Quantity:

Place an X in the appropriate boxes to indicate the facility types found at the site.

the "total facility waste amount" space give the estimated combined quantity (volume) of hazardous wastes at the site in cubic feet or gallons.

the "total facility area" space, give the estimated area size which the facilities occupy using square feet or acres.

Facility Type

1. ☐ Piles
2. ☐ Land Treatment
3. ☐ Landfill
4. ☐ Tanks
5. ☐ Impoundment
6. ☐ Underground Injection
7. ☐ Drums, Above Ground
8. ☐ Drums, Below Ground
9. ☒ Other (Specify) See Item I

Total Facility Waste Amount

cubic feet EST. 75,000

gallons _____

Total Facility Area

square feet EST. 15,000

acres _____

Known, Suspected or Likely Releases to the Environment:

Place an X in the appropriate boxes to indicate any known, suspected, or likely releases of wastes to the environment.

☐ Known ☐ Suspected ☐ Likely ☐ None

Note: Items Hand I are optional. Completing these items will assist EPA and State and local governments in locating and assessing hazardous waste sites. Although completing the items is not required, you are encouraged to do so.

Sketch Map of Site Location: (Optional)

Sketch a map showing streets, highways, routes or other prominent landmarks near the site. Place an X on the map to indicate the site location. Draw an arrow showing the direction north. You may substitute a publishing map showing the site location.

Facility photograph attached.

Description of Site: (Optional)

Describe the history and present conditions of the site. Give directions to the site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.

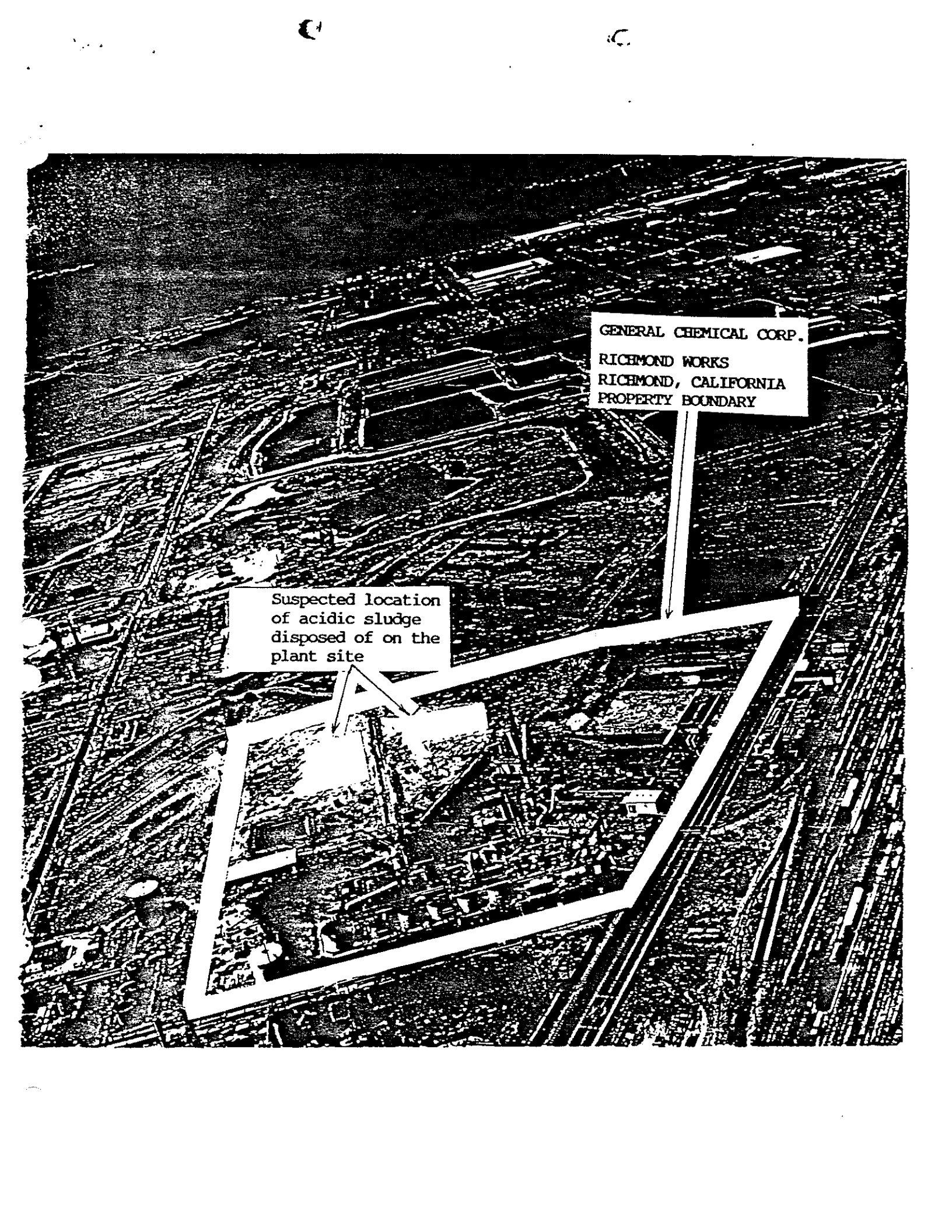
To the best of our knowledge, during the late 1960's approximately 75,000 cubic feet of acidic sludge was disposed of on-site. An analysis of this sludge is attached as Table 1 and lists those organic materials contained in the sludge in concentrations greater than 1%.

Signature and Title:

The person or authorized representative (such as plant managers, superintendents, trustees or attorneys) of persons required to notify must sign the form and provide a mailing address (if different than address in item A). For other persons providing notification, the signature is optional. Check the boxes which best describe the relationship to the site of the person required to notify. If you are not required to notify check "Other".

Name Edward J. ShieldsStreet 90 East Halsey RoadCity Parsippany State NJ Zip Code 07054Signature Date 9/18/87

- ☒ Owner, Present
- ☐ Owner, Past
- ☐ Transporter
- ☒ Operator, Present
- ☐ Operator, Past
- ☐ Other



GENERAL CHEMICAL CORP.
RICHMOND WORKS
RICHMOND, CALIFORNIA
PROPERTY BOUNDARY

This is a high-contrast, black and white aerial photograph of an industrial facility. A thick white line outlines a large rectangular area, which is identified by a text box as the property boundary of General Chemical Corp. Richmond Works. Within this boundary, a specific area is marked with a white 'X' and labeled as the suspected location of acidic sludge disposal. The surrounding landscape shows various industrial structures, roads, and possibly some vegetation, though the high contrast makes details difficult to discern. The overall image has a grainy, high-contrast quality typical of older aerial photography.

Suspected location
of acidic sludge
disposed of on the
plant site

TABLE 1

ORGANIC MATERIALS PRESENT ABOVE 1X AREARICHMOND, CA. "PIT SAMPLE"AREA %COMPOUND

1.1	3,3,5-trimethyl-1-hexene
3.5	isopropylbenzene
1.0	2-amino-5-methyl-1,3,4-thiadiazol
1.8	2-methylthio-thiophene
2.0	4-nitro-pentanoic acid, methyl ester
8.5	1,3,5-trimethylbenzene
1.2	4-nitro-pentanoic acid, methyl ester
1.7	ethylthiocyclopentane
5.6	2-methoxy-3-methyl-2-butenic acid
2.4	cyclopentylisopropyl sulfide
1.4	2,2,2-cyclohexylmethylpropyl acetic acid, methyl ester
2.5	1,2,3,4-tetramethylbenzene
6.8	sec-butylcyclopentyl sulfide
1.0	cyclopentylpropyl sulfide
1.1	1(methylethyl)thio cyclohexane
1.8	isobutylcyclopentyl sulfide
2.7	4,8-dimethyl-7-nonene-2-one
1.3	naphthalene
1.0	1-ethylnaphthalene
3.2	organo sulfur compound
1.5	organo sulfur compound
3.2	decanoic acid, methyl ester
2.0	substituted cyclohexene
1.6	1-(2-methoxyphenyl)-2-propanone oxime
3.3	2-methylnaphtho[1,2-B]Furan-4,5-dione

Notification of Hazardous Waste Site

United States
Environmental Protection
Agency
Washington DC 20460

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1991.

Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

A. Person Required to Notify:

Enter the name and address of the person or organization required to notify.

Name Allied Corporation
Street P. O. Box 1139R
City Morristown State N J Zip Code 07960

B. Site Location:

Enter the common name (if known) and actual location of the site.

Name of Site Richmond Works
Street 525 Castro Street, P. O. Box 1712
City Richmond County Contra Costa State Cal Zip Code 94802

C. Person to Contact:

Enter the name, title (if applicable), and business telephone number of the person to contact regarding information submitted on this form.

Name (Last, First and Title) Shields, Edward
Phone (201) 455-5630
Director, Environmental Services, Allied Chemical *

D. Dates of Waste Handling:

Enter the years that you estimate waste treatment, storage, or disposal began and ended at the site.

From (Year) 1944 To (Year) Current

E. Waste Type: Choose the option you prefer to complete

Option 1: Select general waste types and source categories. If you do not know the general waste types or sources, you are encouraged to describe the site in Item I—Description of Site.

General Type of Waste:
Place an X in the appropriate boxes. The categories listed overlap. Check each applicable category.

1. ☐ Organics
2. ☐ Inorganics
3. ☐ Solvents
4. ☐ Pesticides
5. ☒ Heavy metals
6. ☒ Acids
7. ☐ Bases
8. ☐ PCBs
9. ☐ Mixed Municipal Waste
10. ☐ Unknown
11. ☐ Other (Specify)

Source of Waste:
Place an X in the appropriate boxes.

1. ☐ Mining
2. ☐ Construction
3. ☐ Textiles
4. ☐ Fertilizer
5. ☐ Paper/Printing
6. ☐ Leather Tanning
7. ☐ Iron/Steel Foundry
8. ☒ Chemical, General
9. ☐ Plating/Polishing
10. ☐ Military/Ammunition
11. ☐ Electrical Conductors
12. ☐ Transformers
13. ☐ Utility Companies
14. ☐ Sanitary/Refuse
15. ☐ Photofinish
16. ☐ Lab/Hospital
17. ☐ Unknown
18. ☐ Other (Specify)

Option 2: This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 300 regulations (40 CFR Part 261).

Specific Type of Waste:
EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter appropriate four-digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by contacting the EPA Region serving the State in which the site is located.

ATTACHMENT C

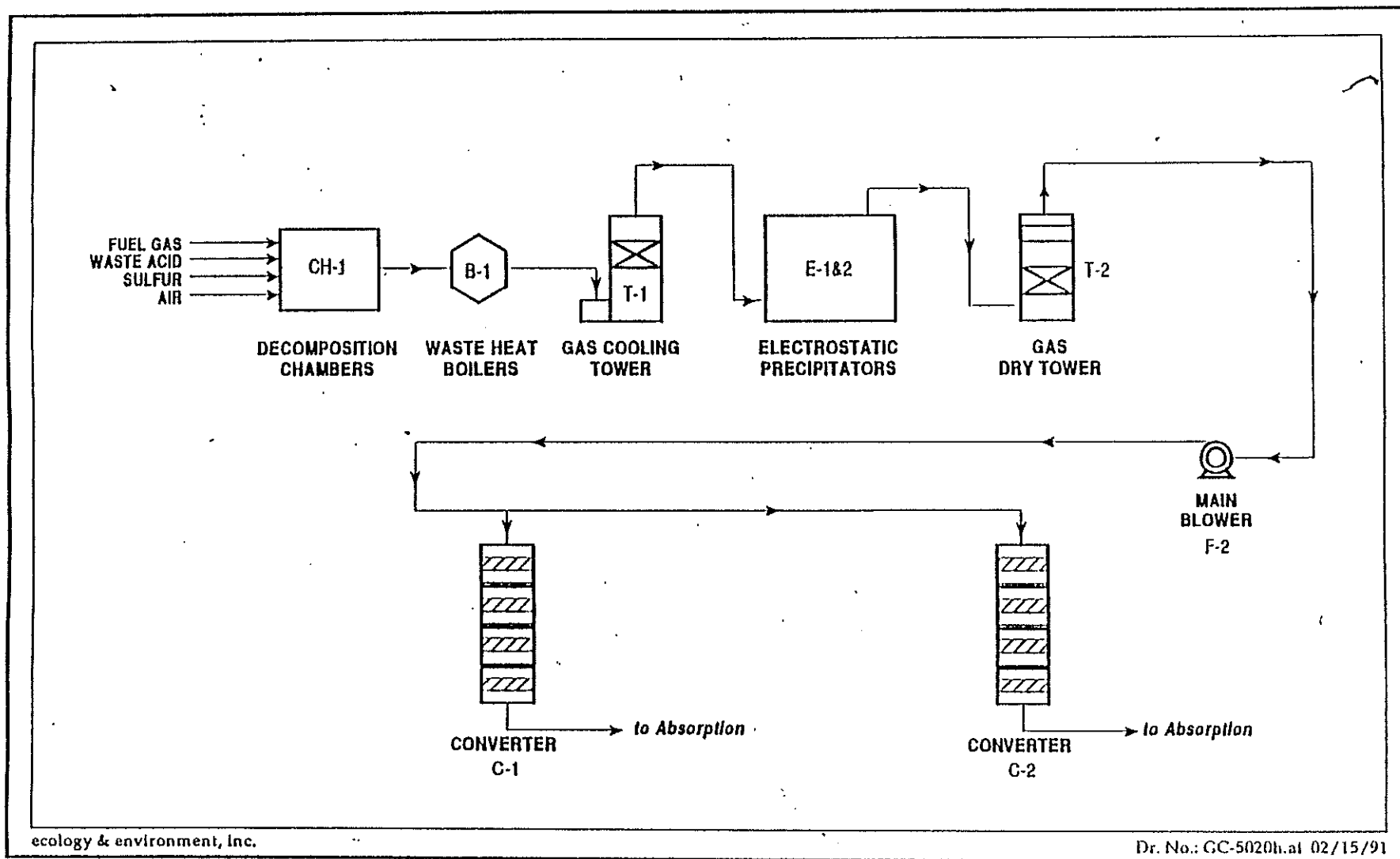


Figure 2-1
 -- SO_2 FLOW DIAGRAM --
 RICHMOND WORKS

ATTACHMENT D

WASTE PROFILE SHEET

56581

As prescribed by the Resource Conservation and Recovery Act (Public Law 96-510) and the Federal Hazardous Waste Management and Handling Act (Public Law 94-469), a detailed chemical and physical analysis must be submitted and the results must be made available to the public. This information is necessary to evaluate whether your waste can be safely and economically transported and disposed of in an environmentally sound manner. Be as complete as possible. If an area is not applicable, mark "N/A". Should a laboratory analysis be available, please attach it to this form. We can arrange analytical laboratory services, if needed, for an appropriate fee. All information we receive will be held in strictest confidence in protect your interests. SAMPLE WILL NOT BE PROCESSED UNLESS ALL AREAS OF THIS SHEET ARE PROPERLY FILLED IN.

Purchase Order No. _____ I.D. WPSF

EXHIBIT A TO _____ Contract Date _____ Representative _____

I. GENERATOR INFORMATION

Name of Company: General Chemical Corporation
 Facility Address: 525 Castro Street
Richmond, CA 94801
 Mailing Address: P.O. Box 1712
Richmond, CA 94802
 Invoice Directions: _____
 Telephone: _____
 General Contact: Geoffrey Trapp
 Company Name: General Chemical
 Name: Geoffrey Trapp
 Title: Operations Supervisor
 Telephone: 415-232-7143

II. SOURCE OF WASTE

Describe the product or business of generator
Sulfuric Acid

Waste Name: Flyash

Describe the waste generating process
Decomposition of spent H₂SO₄

III. WASTE PROPERTIES

Physical state at room temperature: X Solid Liquid Sludge

Is the waste an Aqueous (Water) Solution? Yes X No

pH Range (circle one): (2) 2-4 5-8 9-12.5 ≥ 12.5

OTHER PHYSICAL PARAMETERS

Color: Brown Density: 984 lbs/gal Odor (optional):

Is the waste contaminated: NA Sol N/A Debris

Describe

IV. LISTED F, X, U, AND/OR P HAZARDOUS WASTES

This waste stream does not contain any F, X, U, or P listed waste either in pure form, as a mixture, or as a treatment residue (i.e. ash, leachate, spent cleanup, etc.) except as listed below.

F, X, U or P hazardous waste present? Yes X No

List the waste codes, if any, here:

"Waste water" is defined by EPA as having less than the flammable solids and less than 1% total organic carbon, for the first third waste.

Is this waste a "waste water"? Yes X No

Has this waste been treated to meet the applicable standards of Table COWE and COW?

Does this waste meet the applicable standards of Table COWE and COW without treatment? Yes X No

Is this a mixed hazardous waste and PCB waste that has been treated in a high efficiency boiler, incinerator or other thermal treatment unit? Yes X No

If this waste is K061 then list the zinc concentration here: _____ mg/kg

V. D-CODED HAZARDOUS WASTE (40 CFR 261 SUBPART C) The concentrations referred to in items 4 through 17 are those determined to be EP Toxic.

Each item below must be circled yes or no

Item	D-Code	Parameter	Circle One
1	D001	Ignitable $\leq 140^\circ\text{F}$	Yes <u>(No)</u>
2	D002	Corrosivity ≤ 2.0 or ≥ 12.5	Yes <u>(No)</u>
3	D003	Reactivity	Yes <u>(No)</u>
4	D004	Arsenic ≥ 5.0 mg/l	Yes <u>(No)</u>
5	D005	Barium ≥ 100 mg/l	Yes <u>(No)</u>
6	D006	Cadmium ≥ 1.0 mg/l	Yes <u>(No)</u>
7	D007	Chromium ≥ 5.0 mg/l	Yes <u>(No)</u>
8	D008	Lead ≥ 5.0 mg/l	Yes <u>(No)</u>
9	D009	Mercury ≥ 0.2 mg/l	Yes <u>(No)</u>

Item	D-Code	Parameter	Circle One
10	D010	Selenium ≥ 1.0 mg/l	Yes <u>(No)</u>
11	D011	Silver ≥ 5.0 mg/l	Yes <u>(No)</u>
12	D012	Endrin ≥ 0.02 mg/l	Yes <u>(No)</u>
13	D013	Lindane ≥ 0.4 mg/l	Yes <u>(No)</u>
14	D014	Methoxychlor ≥ 10.0 mg/l	Yes <u>(No)</u>
15	D015	Toxaphene ≥ 0.5 mg/l	Yes <u>(No)</u>
16	D016	2,4-D ≥ 10.0 mg/l	Yes <u>(No)</u>
17	D017	2,4,5-TP Slives ≥ 1.0 mg/l	Yes <u>(No)</u>

VI. CALIFORNIA LIST WASTES

NA

For all liquid hazardous waste including free liquids associated with any sludge or solid, does the liquid contain any of the following parameters in excess of the listed limit? Each item below must be circled yes or no.

Item	Parameter	Limit	Circle One
1	pH	≤ 2.0	Yes <u>(No)</u>
2	Free Cyanides (per EPA method 9010 or 9012)	≥ 1000 mg/l	Yes <u>(No)</u>
3	PCBs	≥ 50 mg/l	Yes <u>(No)</u>
4	Arsenic and/or compounds (as As)	≥ 500 mg/l	Yes <u>(No)</u>
5	Cadmium and/or compounds (as Cd)	≥ 100 mg/l	Yes <u>(No)</u>
6	Chromium (VI) and/or compounds (as CrVI)	≥ 500 mg/l	Yes <u>(No)</u>
7	Lead and/or compounds (as Pb)	≥ 20 mg/l	Yes <u>(No)</u>
8	Mercury and/or compounds (as Hg)	≥ 134 mg/l	Yes <u>(No)</u>
9	Nickel and/or compounds (as Ni)	≥ 100 mg/l	Yes <u>(No)</u>
10	Selenium and/or compounds (as Se)	≥ 130 mg/l	Yes <u>(No)</u>
11	Thallium and/or compounds (as Tl)	≥ 130 mg/l	Yes <u>(No)</u>

All yes or no choices must be made. For all wastes attach copy of waste analysis data, if available.

Halogenated Organic Compounds (HOCs)

Does the waste stream contain a total concentration of halogenated organic compounds (see attached HOC LIST - Appendix III to Part 269) in excess of 1,000 mg/l.

Yes (No)

VII. SHIPPING INFORMATION (40 CFR 173)

Proper DOT Shipping Name: Corrosive Solid N.O.S. 2002
 DOT Hazard Class: Corrosive 11B
 Method of Shipment: () Bulk Liquids () Bulk Solids () Other explain

Reportable Quantity

Special Handling and Safety Instructions

I certify and warrant that the above information, the information attached, and the waste stream as described is true and correct to the best of my knowledge and ability. Willful or deliberate omissions have not been made. All known and/or suspected hazardous waste has been disclosed. A sample representative of the waste stream has been collected using EPA approved methods and has been sent to the proper facility.

Analytical Report

LOG NO: E90-08-568

Received: 24 AUG 90

Reported: 18 SEP 90

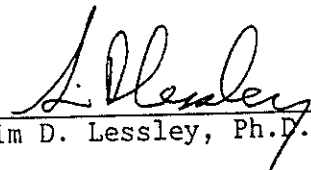
Mr. Lucia Lane
General Chemical, Richmond Works
Post Office Box 1712
Richmond, California 94802

Purchase Order: 590

REPORT OF ANALYTICAL RESULTS

Page 2

LOG NO	SAMPLE DESCRIPTION, CALIF WASTE EXTRACT SAMPLES	DATE SAMPLED
08-568-2	Fly Ash - August 1990	23 AUG 90
PARAMETER	08-568-2	
Fourteen CAM Metals by ICAP		
Silver, mg/L	<0.05	
Barium, mg/L	0.12	
Beryllium, mg/L	0.01	
Cadmium, mg/L	4.6	
Cobalt, mg/L	3.2	
Chromium, mg/L	140	
Copper, mg/L	92	
Molybdenum, mg/L	23	
Nickel, mg/L	100	
Lead, mg/L	7.9	
Antimony, mg/L	3.1	
Thallium, mg/L	0.8	
Vanadium, mg/L	3.6	
Zinc, mg/L	250	
Arsenic, mg/L	0.83	
Selenium, mg/L	<0.02	
Mercury, mg/L	<0.005	
CAM WET Extraction, Date	09.05.90	


Sim D. Lessley, Ph.D., Laboratory Director

Analytical Report

LOG NO: E90-08-568

Received: 24 AUG 90

Reported: 18 SEP 90

Mr. Lucia Lane
General Chemical, Richmond Works
Post Office Box 1712
Richmond, California 94802

Purchase Order: 590

REPORT OF ANALYTICAL RESULTS

Page 1

LOG NO	SAMPLE DESCRIPTION	DATE SAMPLED
08-568-1	Fly Ash - August 1990	23 AUG 90
PARAMETER	08-568-1	
Fourteen CAM Metals by ICAP		
Silver, mg/kg	<1	
Barium, mg/kg	20	
Beryllium, mg/kg	<0.2	
Cadmium, mg/kg	38	
Cobalt, mg/kg	30	
Chromium, mg/kg	1300	
Copper, mg/kg	1000	
Molybdenum, mg/kg	210	
Nickel, mg/kg	860	
Lead, mg/kg	300	
Antimony, mg/kg	32	
Thallium, mg/kg	<4	
Vanadium, mg/kg	35	
Zinc, mg/kg	3000	
Arsenic, mg/kg	7.2	
Mercury, mg/kg	0.13	
Selenium, mg/kg	<0.4	
Nitric Acid Digestion, Date	80.30.90	
Nitric Acid Digestion, Date	08.28.90	
Flash Point, deg F	NI.I	
pH, Units	0.4	
Sodium, mg/kg	3300	
Aluminum, mg/kg	13000	

ATTACHMENT E

RICHMOND WORKS
EMERGENCY NOTIFICATION (Immediate)

<u>AGENCY:</u>	<u>PHONE NUMBER:</u>
CFRE	(510) 971-2203 (Mobile Phone)
	(510) 620-2127

Emergency Response:

Fire Department, Haz. Mat. Team	911
Police Department	911
Contra Costa Health Dept	(510) 646-1112
	or 646-2286

Management Notification: (Notify in order until one is reached)

Al Stoner	(510) 370-9448
Bob Jewett	(510) 234-9740
Dale Laughlin	(510) 724-3152

EMERGENCY NOTIFICATION (within 30 minutes)

Martha Murray	(408) 459-6822	(Home)
or	(510) 458-7338	(Business)
Burt Fleischer	(908) 788-0706	(Home)
or	(201) 515-1841	(Business)
Ed Shields	(908) 876-3104	(Home)
or	(201) 515-1838	(Business)
Lee Jones	(201) 638-5034	(Home)
or	(201) 515-1840	(Business)
Bay Area Air Quality Managment District	(415) 771-6000	(if necessary)
Reg. Water Quality Control Board	(510) 464-1255	(if necessary)
State Office of Emergency Services	1 (800) 852-7550	
National Response Center (exceeds RQ only)	1 (800) 424-8802	

EMERGENCY NOTIFICATION (within 4 hours)

Jack Kroeger	(201) 635-9320	(Home)
or	(201) 515-2452	(Business)
Jim Tanis	(203) 431-9322	(Home)
or	(201) 267-4054	(Condo, NJ)
or	(201) 515-1821	(Business)
Industrial Risk Insurers	(415) 434-3356	
(fire or explosion)	1 (800) 243-8222	(after hours)

***Follow-up verbal notification with a written report. Submit to OES and CCCHSD.**

**EMERGENCY NOTIFICATIONS AND COMMUNICATIONS
GENERAL CHEMICAL - RICHMOND WORKS**

Fire Department
Emergency Rescue

Richmond Fire Department
Richmond Civic Center
Richmond, CA 94804
911 or (510) 620-6591

Police Department

Richmond Police Department
Richmond Civic Center
Richmond, CA 94804
911 or (510) 620-6666

Hospital

Brookside Hospital
2000 Vale Road
San Pablo, CA 94806
(510) 235-7000

Ambulance Service

Regional Ambulance Service
41300 Christie Street
Fremont, CA 94538
911 or (510) 234-3242

Plant Physician

Occupational Medicine
2970 Hilltop Mall Rd. #101
Richmond, CA 94806
(510) 222-8000

Salvage, Overhaul,
Spill Clean Up, or
Hazardous Waste Transport

Erickson, Inc.
255 Parr Blvd.
Richmond, CA 94804
(510) 235-1393

Equipment Supply

Brenton Safety, Inc.
242 Shaw Road
South San Francisco, CA 94080
(415) 873-4333

Alarm System

ADT
(415) 997-7800
(800) 564-9238

Utilities

Pacific Gas & Electric
(510) 233-4360

Emergency Notification

Page 2.

NOTE THAT THE RICHMOND WORKS PLANT MANAGER, REGIONAL ENVIRONMENTAL SUPERVISOR, PRIMARY EMERGENCY COORDINATOR, OR THE ALTERNATES WILL HAVE SOLE RESPONSIBILITY FOR AUTHORIZING CONTACT, NOTIFICATION OR COMMUNICATION WITH ANY OF THE FOLLOWING AGENCIES:

Local Administering Agency

Contra Costa County Department of Health Services
Office of Emergency Services, Hazardous Materials Division
4333 Pacheco Blvd.
Martinez, CA 94553
(510) 646-1112 or (510) 646-2286

Criteria for Notifying: Immediate verbal report of any release or threatened release of a hazardous material or waste.

State Administering Agency

California Office of Emergency Services
2800 Meadowview Road
Sacramento, CA 95832
(800) 852-7550 or (916) 427-4341

Criteria for Notifying: Immediate verbal report of any release or threatened release of a hazardous material/waste, fire or explosion which could threaten human health or the environment.

Federal Administering Agency

Environmental Protection Agency (EPA) Region 9
215 Fremont Street
San Francisco, CA
(415) 974-8172, (510) 744-2000 or (510) 744-1500

Criteria for Notifying: Written report due within fifteen days after any incident relating to any kind of release which adversely affects the environment.

California Department of Health Services

Hazardous Waste Management Branch
2151 Berkeley Way
Berkeley, CA 94704
(510) 540-2043

Criteria for Notifying: Written report due within 15 days of any incident which requires implementing any portion of this plan involving hazardous waste.

Emergency Notification

Page 3.

National Response Center

2100 2nd Street, Southwest, Room 2611
Washington, D.C. 20593
(800) 424-8802 or Local Emergency No. (510) 437-3073

Criteria for Notifying: Report within 24 hours any release of hazardous materials equal to or exceeding the reportable quantity (See 40 CFR, part 302).

Chemtrec

2501 "M" Street, Northwest
Washington, D.C. 20037
(800) 424-9300

Criteria for Notifying: For emergency assistance or information in the event of a release or accident of hazardous materials, substance or waste.

Also: Gentrec (800) 631-8050, same criteria as Chemtrec

California Regional Water Quality Control Board

1111 Jackston Street, Room 6000
Oakland, CA 94607
(510) 464-1255

Criteria for Notifying: Immediate verbal notification of the release of any hazardous substance to the waters of the state which could affect the chemical, physical, biological, bacteriological or radiological characteristics to affect its use.

Bay Area Air Quality Management District (BAAQMD)

939 Ellis Street
San Francisco, CA 94109
(415) 771-6000

Criteria for Notifying: Immediate verbal notification of the accidental release of toxic air contaminants which may cause or contribute to an increase in mortality or serious illness or which may pose a present or potential hazard to human health.

U.S.C.G. Marine Safety

(415) 437-3073

Criteria for Notifying: Immediate verbal notification of the release of any hazardous substance to navigable waters of the state.

Emergency Notification
Page 4.

RCRA Information Hotline
(Same as National Response Center)
(800) 424-8802

Criteria for Notifying: For informational purposes only relating to hazardous waste issues.

**NOTIFICATION MUST ALSO BE GIVEN TO ONE OF THE
FOLLOWING GENERAL CHEMICAL PERSONNEL:**

<u>Name</u>	<u>Home Phone</u>	<u>Work Phone</u>
Martha Murray	(408) 459-6822	(510) 458-7338
B. N. Fleischer	(908) 788-0706	(201) 515-1841
E. J. Shields	(908) 876-3104	(201) 515-1838

No further notification action is legally required by General Chemical.

The U.S. Coast Guard, National Response Center, acting as a clearinghouse, will notify appropriate agencies and inform the Plant Manager of any additional required or requested actions. Other agencies that may require contact include:

FEDERAL

EPA - On Scene Coordinator	(415) 744-2000
EPA - Director, Office of Technical Science and Assistance	(415) 744-1500

STATE AND LOCAL

California Highway Patrol (8:00 a.m. to 5:00 p.m.)	(916) 445-2118 (916) 445-2211
California Department of Fish and Game - Wildlife Protection (8:00 a.m. to 4:30 p.m.)	(916) 653-4094
Contra Costa County Public Works Department After Hours (Sheriff's Dispatch)	(510) 313-7000 (510) 646-2441

ATTACHMENT F

During safety meetings, all employees were shown a video by MSA on cartridge respirators. Maintenance employees were also shown a video by MSA on airline respirators. All employees were given "lecture" by their supervisor from the attached handout. The information on the handout was also reinforced by Lucia Lane during Respirator Fit Testing with each individual employee in December.

GENERAL CHEMICAL
RICHMOND WORKS
Training Checklist

Training Respirators

Employee	Training By	Date of Training	Comments
Bob Jewett	RB LL	11-24-92	
Gordon Tripp	Retired 9/92	////////////////////	////////////////////
Al Stoner	LL	12-21-92	
Dale Laughlin	RB LL	11-24-92	
Lucia Lane	RB	11-24-92	(CRA held Safety meeting)
Randy Nickle	Left company		
Richard Boom	LL	11-24-92	
Dennis Chuning	LL	11-25-92	
Joe Ramsev	Left company 7-31-92	////////////////////	////////////////////
Bill Trice	LL	11-26-92	
Adam Days	LL	12-21-92	
Jon Becker	RB RA	11-25-92	
Bill McNab	RB	11-27-92	
Gene Porter	BT	11-26-92	
Bill Sampson Jr.	RB LL	11-24-92	
Herald Tripp	BT	11-29-92	
Don Haskell	RB	11-25-92	
Mike Hester	LL	12-21-92	
Steve Peckham	BT	11-29-92	
Doug Potter	BT	11-26-92	
Jack Casarez	RB	11-27-92	
Leslie Goins	OL	12-1-92	
Norm Gercken	OL	12-1-92	
Mike Scott	RB	11-30-92	
Bill Harvey	Retired		
Dennis Hoover	OL	1-12-93	
Tom Miller	RB LL	11-24-92	
Ken Taylor	OL	1-12-93	
Blaine Yaris	OL	1-12-93	
Jeff Armstrong	OL	1-12-93	
LD Estabrook	Retired 5/1/92	////////////////////	////////////////////
Rodney Mills	Left Company 8-7-92	////////////////////	////////////////////
Charles Sheets	OL	1-12-93	
Scott Callahan	OL	1-12-93	
Ed Sangco	OL	1-12-93	
Rick Kersev	OL	1-12-93	
Eric Miller	LL	12-21-92	
Ed Pike*	RB LL	11-24-92	
Janet Gustafson*			
Pam Piscitelli*			

*Office Personnel



RICHLAND WORKS
EMPLOYEE
CERTIFICATE OF TRAINING

EMPLOYEE Eric Miller

SOC.SEC. #

: SUPERVISOR/:	:	:	:	:	:
: INSTRUCTOR :	DATE :	:	:	TRAINEE :	DATE :
:	:	:	RCRA :	:	:
:	:	:	SPCC OIL & CHEMICAL :	:	:
: Bill Hwa :	1/6/93 :	:	SCBA :	: [Signature] :	1/6/93 :
:	:	:	EMERGENCY ACTION PLAN :	:	:
:	:	:	EMERGENCY DRILL :	:	:
:	:	:	CRANE OPERATOR :	:	:
:	:	:	LEAD EXPOSURE :	:	:
:	:	:	HAZARD COMMUNICATION :	:	:
:	:	:	RESPIRATOR :	:	:
:	:	:	FIRE :	:	:
:	:	:	HEARING CONSERVATION :	:	:
:	:	:	FORKLIFT/PAYLOADER :	:	:
:	:	:	LOCKOUT/TAGOUT :	:	:
:	:	:	CONFINED SPACE ENTRY :	:	:
:	:	:	FIRST AID :	:	:
:	:	:	C.P.R. :	:	:
:	:	:	ASBESTOS :	:	:
:	:	:	:	:	:
:	:	:	:	:	:

COMMENTS

Signature of Supervisor/Instructor certifies that the above training has been completed. Trainee signature verifies that the designated training has been received.

ATTACHMENT G

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME General Chemical Corporation
525 Castro St. Richmond, CA
94801

EPA ID NO.

C	A	D	0	2	8	9	8	1	9	6	7
---	---	---	---	---	---	---	---	---	---	---	---



U.S. ENVIRONMENTAL PROTECTION AGENCY

1991 Hazardous Waste Report

FORM

IC

IDENTIFICATION AND CERTIFICATION

INSTRUCTIONS: Read the detailed instructions beginning on page 6 of the 1991 Hazardous Waste Report booklet before completing this form.

SEC. I Site name and location address. Complete items A through H. Check the box <input checked="" type="checkbox"/> in items A, C, E, F, G, and H if same as label; if different, enter corrections. If label is absent, enter information. Instruction page 6	
A. EPA ID No. Same as label <input type="checkbox"/> or <u>CA D 0 2 8 9 8 1 9 6 7</u>	B. County <u>Contra Costa</u>
C. Site/company name Same as label <input type="checkbox"/> or <u>General Chemical Corp.</u>	D. Has the site name associated with this EPA ID changed since 1989? <input checked="" type="checkbox"/> 1 Yes <input type="checkbox"/> 2 No
E. Street name and number. If not applicable, enter industrial park, building name or other physical location description. Same as label <input type="checkbox"/> <u>525 Castro St.</u>	
F. City, town, village, etc. Same as label <input type="checkbox"/> <u>Richmond</u>	G. State Same as label <input type="checkbox"/> <u>CA</u>
	H. Zip Code Same as label <input type="checkbox"/> <u>9 4 8 0 1</u>

SEC. II Mailing address of site. Instruction page 6	
A. Is the mailing address the same as the location address? <input type="checkbox"/> 1 Yes (SKIP TO SEC. III) <input checked="" type="checkbox"/> 2 No (GO TO BOX B)	
B. Number and street name of mailing address <u>P.O. Box 1712</u>	
C. City, town, village, etc. <u>Richmond</u>	D. State <u>CA</u>
	E. Zip Code <u>9 4 8 0 2</u>

SEC. III Name, title, and telephone number of the person who should be contacted if questions arise regarding this report. Instruction page 6	
A. Please print: Last name <u>Jewett</u>	First name <u>Robert</u>
M.I. <u>B.</u>	B. Title <u>Plant Manager</u>
C. Telephone <u>5 1 0 2 3 2</u> - <u>7 1 9 3</u> Extension <u> </u>	

SEC. IV Enter the Standard Industrial Classification (SIC) Code that describes the principal products, group of products, produced or distributed, or the services rendered at the site's physical location. Enter more than one SIC Code only if no one industry description includes the combined activities of the site. Instruction page 7			
A. <u>2 8 1 9</u>	B. <u> </u>	C. <u> </u>	D. <u> </u>

SEC. V "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties under Section 3008 of the Resource Conservation and Recovery Act for submitting false information, including the possibility of fine and imprisonment for knowing violations."	
A. Please print: Last name <u>Jewett</u>	First name <u>Robert</u>
M.I. <u>B.</u>	B. Title <u>Plant Manager</u>
C. Signature 	D. Date of signature <u>02</u> <u>18</u> <u>92</u> MO. DAY YR.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL
OR ENTER:

SITE NAME General Chemical Corporation
525 Castro St. Richmond, CA
94801

EPA ID NO. CAD 028 981 967



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1991 Hazardous Waste Report

FORM
GM

WASTE GENERATION AND
MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 13 of the 1991 Hazardous Waste Report booklet before completing this form.

Sec. I	A. Waste description Instruction Page 15 <u>Toxic fly ash, from boilers used in sulfuric acid manufacturing, containing chromium</u>				
B. EPA hazardous waste code Page 15 <u>D007</u>			C. State hazardous waste code Page 15 <u>571</u>		
D. SIC code Page 15 <u>2819</u>	E. Origin code Page 16 <u>1</u> System type <u>IM</u> <u>NA</u>	F. Source code Page 17 <u>A</u> <u>74</u>	G. Point of measurement Page 17 <u>1</u>	H. Form code Page 17 <u>B</u> <u>303</u>	
I. RCRA-radioactive mixed Page 17 <u>2</u>		J. Reported TRI constituent Page 18 <u>2</u>			
K. CAS numbers Page 18 1. <u>NA</u> 2. <u>NA</u> 3. <u>NA</u> 4. <u>NA</u> 5. <u>NA</u>					

Sec. II	A. Quantity generated in 1990 Instruction Page 18 <u>1</u> <u>6</u> <u>6</u>	B. Quantity generated in 1991 Page 18 <u>1</u> <u>4</u> <u>16</u>	C. UCM Page 19 <u>2</u>	D. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 19 <input type="checkbox"/> 1 Yes (CONTINUE TO SYSTEM 1) <input checked="" type="checkbox"/> 2 No (SKIP TO SEC. III)
ON-SITE SYSTEM 1 On-site system type Page 19 <u>IM</u>		ON-SITE SYSTEM 2 On-site system type Page 19 <u>IM</u>		

Sec. III	A. Was any of this waste shipped off site in 1991? Instruction Page 20 <input checked="" type="checkbox"/> 1 Yes (CONTINUE TO BOX B) <input type="checkbox"/> 2 No (SKIP TO SEC. IV)			
Site 1	B. EPA ID No. of facility waste was shipped to Page 20 <u>UTD</u> <u>991</u> <u>301</u> <u>748</u>	C. System type shipped to Page 20 <u>IM</u> <u>132</u>	D. Off-site availability code Page 21 <u>1</u>	E. Total quantity shipped in 1991 Page 21 <u>14</u> <u>6</u>
Site 2	B. EPA ID No. of facility waste was shipped to Page 20 <u>NA</u>	C. System type shipped to Page 20 <u>IM</u> <u>NA</u>	D. Off-site availability code Page 21 <u>NA</u>	E. Total quantity shipped in 1991 Page 21 <u>NA</u>

Sec. IV	A. Did new activities in 1991 result in minimization of this waste? Instruction Page 22 <input type="checkbox"/> 1 Yes (CONTINUE TO BOX B) <input checked="" type="checkbox"/> 2 No (THIS FORM IS COMPLETE)			
B. Activity Page 22 <u>W</u> <u>W</u>	C. Other effects Page 22 <input type="checkbox"/> 1 Yes <input type="checkbox"/> 2 No	D. Quantity recycled in 1991 due to new activities Page 23 <u> </u>	E. Activity/production index Page 23 <u> </u>	F. 1991 Source reduction quantity Page 24 <u> </u>

Comments:

Page 4 of 9

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL
OR ENTER:

SITE NAME General Chemical Corporation

525 Castro St. Richmond, CA
94801

EPA ID NO. CAD 028 981 967



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1991 Hazardous Waste Report

FORM
GM

WASTE GENERATION AND
MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 13 of the 1991 Hazardous Waste Report booklet before completing this form.

Sec. I	A. Waste description Instruction Page 15 <u>Spent Solvent</u>				
B. EPA hazardous waste code Page 15 <u>D001</u> <u>D003</u>		C. State hazardous waste code Page 15 <u>213</u>			
D. SIC code Page 16 <u>2819</u>	E. Origin code Page 16 <u>2</u> System type <u>M</u> <u>NA</u>	F. Source code Page 17 <u>A</u> <u>19</u>	G. Point of measurement Page 17 <u>3</u>	H. Form code Page 17 <u>B</u> <u>211</u>	
I. RCRA-radioactive mixed Page 17 <u>12</u>					
J. Reported TRI constituent Page 18 <u>2</u>	K. CAS numbers Page 18 1. <u>NA</u> 2. <u>NA</u> 3. <u>NA</u> 4. <u>NA</u> 5. <u>NA</u>				

Sec. II	A. Quantity generated in 1990 Instruction Page 18 <u> </u>	B. Quantity generated in 1991 Page 18 <u>110</u>	C. UOM Page 19 <u>8</u> <u>2</u> <input checked="" type="checkbox"/> 1 lbs/gal <input type="checkbox"/> 2 sg	D. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 19 <input type="checkbox"/> 1 Yes (CONTINUE TO SYSTEM 1) <input checked="" type="checkbox"/> 2 No (SKIP TO SEC. III)
ON-SITE SYSTEM 1 On-site system type Page 19 <u>M</u>		ON-SITE SYSTEM 2 On-site system type Page 19 <u>M</u>		

Sec. III	A. Was any of this waste shipped off site in 1991? Instruction Page 20 <input checked="" type="checkbox"/> 1 Yes (CONTINUE TO BOX B) <input type="checkbox"/> 2 No (SKIP TO SEC. IV)			
Site 1	B. EPA ID No. of facility waste was shipped to Page 20 <u>KSD</u> <u>007</u> <u>246</u> <u>846</u>	C. System type shipped to Page 20 <u>M</u> <u>041</u>	D. Off-site availability code Page 21 <u>1</u>	E. Total quantity shipped in 1991 Page 21 <u>110</u>
Site 2	B. EPA ID No. of facility waste was shipped to Page 20 <u> </u>	C. System type shipped to Page 20 <u>M</u>	D. Off-site availability code Page 21 <u> </u>	E. Total quantity shipped in 1991 Page 21 <u> </u>

Sec. IV	A. Did new activities in 1991 result in minimization of this waste? Instruction Page 22 <input type="checkbox"/> 1 Yes (CONTINUE TO BOX E) <input checked="" type="checkbox"/> 2 No (THIS FORM IS COMPLETE)			
B. Activity Page 22 <u>W</u> <u>W</u> <u>W</u> <u>W</u>	C. Other effects Page 22 <input type="checkbox"/> 1 Yes <input type="checkbox"/> 2 No	D. Quantity recycled in 1991 due to new activities Page 23 <u> </u>	E. Activity/production Index Page 23 <u> </u>	F. 1991 Source reduction quantity Page 24 <u> </u>

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL
OR ENTER:

SITE NAME

General Chemical Corporation

525 Castro St. Richmond, CA

94801

EPA ID NO.

CAD 028 981 967



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1991 Hazardous Waste Report

FORM
GM

WASTE GENERATION AND
MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 13 of the 1991 Hazardous Waste Report booklet before completing this form.

Sec.
I

A. Waste description
Instruction Page 15

Transformers with oil contaminated with P.C.B.'s

B. EPA hazardous waste code
Page 15

NA

C. State hazardous waste code
Page 15

261

D. SIC code
Page 16

2819

E. Origin code
Page 16

2

System type

NA

F. Source code
Page 17

56

G. Point of measurement
Page 17

8

H. Form code
Page 17

207

I. RCRA-radioactive mixed
Page 17

2

J. Reported TRI constituent
Page 18

2

K. CAS numbers
Page 18

NA

1. NA 2. NA

3. NA 4. NA 5. NA

Sec.
II

A. Quantity generated in 1990
Instruction Page 18

NA

B. Quantity generated in 1991
Page 18

9107.0

C. UOM Density
Page 19

1

☐ 1 lbs/gal ☐ 2 sg

D. Did this site do any of the following to this
waste: treat on site, dispose on site, recycle
on site, or discharge to a sewer/POTW?
Page 19

☐ 1 Yes (CONTINUE TO SYSTEM 1)
☒ 2 No (SKIP TO SEC. III)

ON-SITE SYSTEM 1

On-site system type
Page 19

M

Quantity treated, disposed or recycled on site in 1991

ON-SITE SYSTEM 2

On-site system type
Page 19

M

Quantity treated, disposed or recycled on site in 1991

Sec.
III

A. Was any of this waste shipped off site in 1991?
Instruction Page 20

☒ 1 Yes (CONTINUE TO BOX B)
☐ 2 No (SKIP TO SEC. IV)

Site
1

B. EPA ID No. of facility waste was shipped to
Page 20

CAD 030 584 502

C. System type shipped to
Page 20

041

D. Off-site availability code
Page 21

8

E. Total quantity shipped in 1991
Page 21

9107.0

Site
2

B. EPA ID No. of facility waste was shipped to
Page 20

C. System type shipped to
Page 20

M

D. Off-site availability code
Page 21

E. Total quantity shipped in 1991
Page 21

Sec.
IV

A. Did new activities in 1991 result in minimization of this waste?
Instruction Page 22

☐ 1 Yes (CONTINUE TO BOX B)
☒ 2 No (THIS FORM IS COMPLETE)

B. Activity
Page 22

W W
W W

C. Other effects
Page 22

☐ 1 Yes
☐ 2 No

D. Quantity recycled in 1991 due to new activities
Page 23

E. Activity/production Index
Page 23

F. 1991 Source reduction quantity
Page 24

Comments:

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525 Castro St. Richmond, CA

94801

EPA ID NO.

CAD 028 981 967



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1991 Hazardous Waste Report

FORM
GM

WASTE GENERATION AND
MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 13 of the 1991 Hazardous Waste Report booklet before completing this form.

Sec. I	A. Waste description Instruction Page 15 Asbestos Containing Material				
B. EPA hazardous waste code Page 15 NA		C. State hazardous waste code Page 15 151			
D. SIC code Page 15 2819	E. Origin code Page 16 2 System type M NA	F. Source code Page 17 A 56	G. Point of measurement Page 17 4	H. Form code: Page 17 B 311	
I. RCRA-radioactive mixed Page 17 2		J. Reported TRI constituent Page 18 2			
K. CAS numbers Page 18 1. NA 2. NA 3. NA 4. NA 5. NA					

Sec. II	A. Quantity generated in 1990 Instruction Page 18 10	B. Quantity generated in 1991 Page 18 7	C. UCM Page 19 Z	Density DK 1 lbs/gal 2 kg	D. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 19 <input type="checkbox"/> 1 Yes (CONTINUE TO SYSTEM 1) <input checked="" type="checkbox"/> 2 No (SKIP TO SEC. III)
ON-SITE SYSTEM 1 On-site system type Page 19 M		Quantity treated, disposed or recycled on site in 1991			
ON-SITE SYSTEM 2 On-site system type Page 19 M		Quantity treated, disposed or recycled on site in 1991			

Sec. III	A. Was any of this waste shipped off site in 1991? Instruction Page 20 <input checked="" type="checkbox"/> 1 Yes (CONTINUE TO BOX B) <input type="checkbox"/> 2 No (SKIP TO SEC. IV)				
Site 1	B. EPA ID No. of facility waste was shipped to Page 20 CAD 981 388 952	C. System type shipped to Page 20 M 132	D. Off-site availability code Page 21 1	E. Total quantity shipped in 1991 Page 21 7	
Site 2	B. EPA ID No. of facility waste was shipped to Page 20	C. System type shipped to Page 20 M	D. Off-site availability code Page 21	E. Total quantity shipped in 1991 Page 21	

Sec. IV	A. Did new activities in 1991 result in minimization of this waste? Instruction Page 22 <input type="checkbox"/> 1 Yes (CONTINUE TO BOX B) <input checked="" type="checkbox"/> 2 No (THIS FORM IS COMPLETE)				
B. Activity Page 22 W W	C. Other effects Page 22 <input type="checkbox"/> 1 Yes <input type="checkbox"/> 2 No	D. Quantity recycled in 1991 due to new activities Page 23	E. Activity/production Index Page 23	F. 1991 Source reduction quantity Page 24	

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL
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SITE NAME

General Chemical Corporation

525 Castro St. Richmond, CA

94801

EPA ID NO.

CAD 028 981 967



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1991 Hazardous Waste Report

FORM
GM

WASTE GENERATION AND
MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 13 of the 1991 Hazardous Waste Report booklet before completing this form.

Sec.
I

A. Waste description
Instruction Page 15

Lab packs, old laboratory chemicals

B. EPA hazardous waste code
Page 15

LABP NA
NA NA NA

C. State hazardous waste code
Page 15

551

D. SIC code
Page 16

2819

E. Origin code
Page 16

2

System type

M NA

F. Source code
Page 17

A 94

G. Point of measurement
Page 17

4

H. Form code
Page 17

B 001

I. RCRA-radioactive mixed
Page 17

2

J. Reported TRI constituent
Page 18

2

K. CAS numbers
Page 18

1. NA 2. NA
3. NA 4. NA 5. NA

Sec.
II

A. Quantity generated in 1990
Instruction Page 18

57

B. Quantity generated in 1991
Page 18

C. UOM Density
Page 19

1

1 lbs/gal 2 sg

D. Did this site do any of the following to this
waste: treat on site, dispose on site, recycle
on site, or discharge to a sewer/POTW?
Page 19

☐ 1 Yes (CONTINUE TO SYSTEM 1)
☒ 2 No (SKIP TO SEC. III)

ON-SITE SYSTEM 1

On-site system type
Page 19

M

Quantity treated, disposed or recycled on site in 1991

ON-SITE SYSTEM 2

On-site system type
Page 19

M

Quantity treated, disposed or recycled on site in 1991

Sec.
III

A. Was any of this waste shipped off site in 1991?
Instruction Page 20

☐ 1 Yes (CONTINUE TO BOX B)
☒ 2 No (SKIP TO SEC. IV)

Site
1

B. EPA ID No. of facility waste was shipped to
Page 20

C. System type shipped to
Page 20

M

D. Off-site availability code
Page 21

E. Total quantity shipped in 1991
Page 21

Site
2

B. EPA ID No. of facility waste was shipped to
Page 20

C. System type shipped to
Page 20

M

D. Off-site availability code
Page 21

E. Total quantity shipped in 1991
Page 21

Sec.
IV

A. Did new activities in 1991 result in minimization of this waste?
Instruction Page 22

☐ 1 Yes (CONTINUE TO BOX B)
☒ 2 No (THIS FORM IS COMPLETE)

B. Activity
Page 22

W W
W W

C. Other effects
Page 22

☐ 1 Yes
☐ 2 No

D. Quantity recycled in 1991 due to new activities
Page 23

E. Activity/production index
Page 23

F. 1991 Source reduction quantity
Page 24

Comments:

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SITE NAME

General Chemical Corporation

525 Castro St. Richmond, CA

94801

EPA ID NO.

CAD 028 981 967



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1991 Hazardous Waste Report

FORM

GM

WASTE GENERATION AND
MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 13 of the 1991 Hazardous Waste Report booklet before completing this form.

Sec.
I

A. Waste description
Instruction Page 15

Lab pack, old laboratory chemicals

B. EPA hazardous waste code
Page 15

D098

D030

C. State hazardous waste code
Page 15

711

D. SIC code
Page 16

2819

E. Origin code
Page 16

2

System type

M NA

F. Source code
Page 17

A 94

G. Point of measurement
Page 17

1

H. Form code
Page 17

B 004

I. RCRA-radioactive mixed
Page 17

2

J. Reported TRI constituent
Page 18

2

K. CAS numbers
Page 18

NA

1. NA

2. NA

3.

4.

5.

NA

Sec.
II

A. Quantity generated in 1990
Instruction Page 18

4

B. Quantity generated in 1991
Page 18

C. UOM Density
Page 19

1

1 lbs/gal 2 sg

D. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW?
Page 19

☐ 1 Yes (CONTINUE TO SYSTEM 1)
☒ 2 No (SKIP TO SEC. III)

ON-SITE SYSTEM 1

On-site system type
Page 19

M

Quantity treated, disposed or recycled on site in 1991

ON-SITE SYSTEM 2

On-site system type
Page 19

M

Quantity treated, disposed or recycled on site in 1991

Sec.
III

A. Was any of this waste shipped off site in 1991?
Instruction Page 20

☐ 1 Yes (CONTINUE TO BOX B)
☒ 2 No (SKIP TO SEC. IV)

Site
1

B. EPA ID No. of facility waste was shipped to
Page 20

C. System type shipped to
Page 20

M

D. Off-site availability code
Page 21

E. Total quantity shipped in 1991
Page 21

Site
2

B. EPA ID No. of facility waste was shipped to
Page 20

C. System type shipped to
Page 20

M

D. Off-site availability code
Page 21

E. Total quantity shipped in 1991
Page 21

Sec.
IV

A. Did new activities in 1991 result in minimization of this waste?
Instruction Page 22

☐ 1 Yes (CONTINUE TO BOX B)
☒ 2 No (THIS FORM IS COMPLETE)

B. Activity
Page 22

W W
W W

C. Other effects
Page 22

☐ 1 Yes
☐ 2 No

D. Quantity recycled in 1991 due to new activities
Page 23

E. Activity/production index
Page 23

F. 1991 Source reduction quantity
Page 24

Comments:

ATTACHMENT H

**UNIFORM HAZARDOUS
WASTE MANIFEST**

1. Generator's US EPA ID No.

Manifest
Document No.

2. Page 1

Information in the shaded areas
is not required by Federal law.

3. Generator's Name and Mailing Address

GENERAL CHEMICAL CORPORATION
525 CASTRO STREET (P.O. BOX 1712)
RICHMOND, CA 94802

4. Generator's Phone 510-222-7100

A. State Manifest Document Number

90053440

B. State Generator's ID

C. State Transporter's ID

D. Transporter's Phone

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

5. Transporter 1 Company Name

SOLVENT SERVICE, INC.

6. US EPA ID Number

8. US EPA ID Number

7. Transporter 2 Company Name

10. US EPA ID Number

9. Designated Facility Name and Site Address

SOLVENT SERVICE, INC.
1031 BERTYESSA ROAD
SAN JOSE, CA 95133

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers
No. Type

13. Total
Quantity

14.
Unit
Wt/Vol

15.
Waste No.

a. EQ, WASTE FLAMMABLE LIQUIDS, NCS (ETHANOL, XYLENE),
3, UN1993, PG I

b.

c.

d.

J. Additional Descriptions for Materials Listed Above

a. WASTE SOLVENT FL2751

K. Handling Codes for Wastes Listed Above

a.

b.

c.

d.

15. Special Handling Instructions and Additional Information

ALWAYS WEAR PPE WHEN HANDLING HAZARDOUS WASTE

ERG #27

24 HR # 510-232 7/93

16.

GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

EDWARD V. PIKE, PLANT CONTROLLER

Signature

Month Day Year

07 01 93

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

RON E. HARTMAN

Signature

Month Day Year

07 01 93

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Month Day Year

90053440

ONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL
TRANSPORTER

GENERATOR

FACILITY



**FED/ST/SSI-6/91
COVER PAGE**

**LAND DISPOSAL RESTRICTION INFORMATION
NOTIFICATION/CERTIFICATION FORM**

This form is submitted to Solvent Service Co., Inc. in accordance with the requirements stated in 40CFR Part 268 and CCR Title 22, Div. 4, Chapter 30, Article 41.

1. GENERAL INFORMATION

Generator Name: General Chemical
EPA ID Number: CAD028981967
Address: 525 CASTRO ST. RICHMOND, CA 94802
Profile Number: FL 2757

2. WASTE RELATED INFORMATION

a) Treatability Group (Federal) (40CFR 268.2)

- ☐ Waste Water
☒ Non-Waste Water

b) Treatability Group (State)

- ☒ Aqueous Waste
☐ Solid Waste

c) Under manifest number 90053440 we are shipping to you a waste stream classified by the EPA Hazardous Waste Number(s): (Please also add applicable subcategories.) (For information on EPA Waste Numbers reference 40CFR Part 261. For information on subcategories reference 40CFR Part 268.41, .42, .43)

DO NOT IGNITABLE - HIGH TOX

9003

California Hazardous Waste Number(s):

343

d) If additional sheets need to be attached to this form to indicate additional EPA Codes or California Hazardous Waste Number, please do so and mark the area noted below:

☐ (Additional Sheets Attached)



3. WASTE HANDLING INFORMATION

A) RESTRICTED WASTE THAT MUST BE TREATED PRIOR TO LAND DISPOSAL

I am the initial generator of a restricted waste that must be treated prior to land disposal (For Deepwell - Variance May Apply). The waste is restricted due to the following reasons:

- ☒ Solvent Rule (Applies to F001-F005 40CFR 268.30) (See Standards Back of Page)
- ☐ California List (See Standards Back of Page)
- ☒ Scheduled Waste

APPLICABLE STANDARD

- ☐ Performance Based Standard (268.41 (CCWE))
- ☒ Specified Technology (268.42 (TECH))
FSUBS/ROEGS/NC 11 (CODE)
- ☐ Performance Based Standard (268.43 (CCW))
- ☐ Other ()

This waste must be treated to the applicable treatment standard set forth in 40CFR 268.32 or RCRA Section 3004 (d) prior to land disposal (For Deepwell - Variance May Apply). A copy of the treatment standards that apply are maintained at the TSD facility. (See reverse side of this form for certain treatment standards). I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification and attachments. I certify that in the information I submitted in this and all associated documents is true, accurate, and complete. I am aware that there are significant penalties for submitting false certification, including the possibility of a fine and imprisonment.

Edward V. Pike
(Authorized Representative's Signature)

EDWARD V. PIKE
(Print or Type Name)

Plant Controller
(Title)

3/24/92
(Date)



3. WASTE HANDLING INFORMATION

A) RESTRICTED WASTE THAT MUST BE TREATED PRIOR TO LAND DISPOSAL.

I am the initial generator of a restricted waste that must be treated prior to land disposal. The waste is restricted due to the following reasons:

- ☒ Restricted pursuant to Federal Land Ban (See Federal Form)
- ☐ PCB Containing Wastes (Ref 22 CCR 67702 (b) (2))
- ☐ Metal Containing Aqueous Waste containing metal or metal compounds exceeding the restricted values identified in 22CCR 66699 (b). (Ref 22CCR 67702 (b) (1))
- ☐ Auto Shredder Waste (Ref 67002 (b) (3))
- ☒ Non Waste Water Solvent Waste (Ref 67002 (b) (4))
- ☐ Hazardous Waste Foundry Sand (Ref 67002 (b) (5))
- ☐ Non RCRA metal containing fly ash, bottom ash, retort ash, or baghouse waste from sources other than foundries. (Ref 67002 (b) (8))
- ☐ Non RCRA metal containing baghouse waste from foundries. (Ref 67002 (b) (9))

The waste noted must be treated to the applicable treatment standard set forth in CCR Title 22 (Article 41) prior to land disposal. (For Deepwell - Variance May Apply.) A copy of the treatment standards that apply are maintained at the TSD facility. I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification and attachments. I certify that all the information I submitted in this and all associated documents is true, accurate, and complete. I am aware that there are significant penalties for submitting false certification, including the possibility of a fine and imprisonment. (If restricted due to Federal Ban, federal form applies.)

Edward V. Pike
(Authorized Representative's Signature)

EDWARD V. PIKE
(Print or Type Name)

PLANT CONTROLLER
(Title)

3/24/92
(Date)



3. WASTE HANDLING INFORMATION

B) RESTRICTED WASTE THAT IS SUBJECT TO DELAYED PROHIBITION DATE (i.e. EFFECTIVE BUT NOT YET PROHIBITED)

The waste noted is a restricted waste that is subject to a delayed prohibition date which expires on May 8, 1992.

- ☐ Metal Containing Solid Waste with metal or metal compounds listed in 22CCR 66699 (b) exceeding the restricted values. (Ref 22CCR 67702 (b) (7))
(Antimony (15 ppm); Arsenic (15 ppm); Barium (100 ppm); Beryllium (0.75 ppm); Cadmium (1 ppm); Chromium VI (5.0 ppm); Chromium III (560 ppm); Cobalt (80 ppm); Copper (230 ppm); Lead (67 ppm); Mercury (0.2 ppm); Molybdenum (350 ppm); Nickel (20 ppm); Selenium (1.0 ppm); Silver (5.0 ppm); Thallium (7.0 ppm); Vanadium (24.0 ppm); Zinc (250 ppm).
- ☒ Aqueous Organic wastes that contain any organic compound measured by EPA Test Methods 8080, 8140, 8150, 8240, and 8270 described in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods SW 846, Third Edition" exceeding restricted values. (Ref 22CCR 67702 (b) (10))
- ☐ Solid organic wastes that contain any organic compound measured by EPA Test Methods 8080, 8140, 8150, 8240, and 8270 described in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods SW 846, Third Edition" and oil and grease (EPA Method 9071) exceeding restricted values. (Ref 22CCR 67702 (b) (11))

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification and attachments that the waste is delayed from land disposal restriction until May 8, 1992. I certify that all the information submitted in this and all associated documents is true, complete and accurate. I am aware that there are significant penalties for submitting a false certification including the possibility of a fine and imprisonment.

Edward V. Pike
(Authorized Representative's Signature)

EDWARD V. PIKE
(Print or Type Name)

PLANT CONTROLLER
(Title)

3/29/92
(Date)

Print or type. (Form designed for use on elite (12-pitch typewriter).)

**UNIFORM HAZARDOUS
 WASTE MANIFEST**

1. Generator's US EPA ID No. **DA00239319674**
 Manifest Document No. **DA00239319674**

2. Page 1
 of

Information in the shaded areas
 is not required by Federal law.

3. Generator's Name and Mailing Address: **GENERAL CHEMICAL
 515 CASTRO ST
 OAKLAND, CA. 94602**
 4. Generator's Phone **415-232-7143**

A. State Manifest Document Number
89941255

B. State Generator's ID
HAHR36-P20791

5. Transporter 1 Company Name **USPCE**
 6. US EPA ID Number **OKD181514474**

C. State Transporter's ID **105305**
 D. Transporter's Phone **415-524-5011**

7. Transporter 2 Company Name **SOUTHERN PACIFIC**
 8. US EPA ID Number **CAD0069113206**

E. State Transporter's ID
 F. Transporter's Phone **(415) 491-7668**

9. Designated Facility Name and Site Address: **WASTE FACILITY AT GRASSY MOUNTAIN
 3 MILES EAST, 7 MILES NORTH EXIT 41 FF I-80
 LIVE, CA**
 10. US EPA ID Number **HTD791301743**

G. State Facility's ID

H. Facility's Phone **861-531-0051**

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers		13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
	No.	Type			
a. WASTE POISON B, LIQUID, N.O.S. POISON B UN2510 (P096, P030)	001	P	M	0000012	P State 711 EPA/Other P096, P030
b. WASTE POISON B, SOLID, N.O.S. POISON B UN2511 (P096)	001	E	M	0000011	P State EPA/Other P096
c. HAZARDOUS WASTE, SOLID, N.O.S. SKM-E NA 9189	001	P	N	0000011	P State EPA/Other P030
d.					State EPA/Other

J. Additional Descriptions for Materials Listed Above
1. POTASSIUM CYANIDE, ETC.
2. POTASSIUM FERROCYANIDE
3. POTASSIUM CYANIDE

K. Handling Codes for Wastes Listed Above
 a.
 b.
 c.
 d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
 If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name **BOND WHITWORTH** Signature **Bond Whitworth** Month **07** Day **12** Year **90**

17. Transporter 1 Acknowledgement of Receipt of Materials
 Printed/Typed Name **JOHN E. CLAN** Signature **John E. Clan** Month **11** Day **11** Year **90**

18. Transporter 2 Acknowledgement of Receipt of Materials
 Printed/Typed Name Signature Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
 Printed/Typed Name Signature Month Day Year

03341633
 IN CASE OF AN EMERGENCY OR SPILL, CALL THE NA
 PONSE CENTER 1-800-424-8602; WITHIN CALIFORNIA CALL 1-800-852-7550

Do Not Write Below This Line

YELLOW: GENERATOR RETAINS

Notification of Waste
Subject to Land Disposal Restrictions

Manifest number associated with waste shipment

89941255

Generator Name

GENERAL CHEMICAL

Pursuant to 40 CFR 268.7 (a), I hereby notify USPCI that this waste shipment contains a waste(s) that is (are) restricted under the land disposal restrictions contained in either 40 CFR 268 or RCRA Section 3004 (d). This shipment contains one or more of the following wastes which are subject to the listed treatment requirements.

Waste code overlap require all applicable codes, including characteristics, be applied even to listed (F,K,U,P) wastes

Waste (check appropriate boxes)

Treatment Standard

1. ☒ California List Waste (applies to all states)

Complete Reverse Side

2. ☐ F-Solvents ☐ F001 ☐ F002 ☐ F003 ☐ F004 ☐ F005

Complete Reverse Side

	List all D,F,K,U, or P Waste Codes (eg. F006, D003)	Subcategory (if any)	Treatability Group (eg. wastewater or nonwastewater)	Treatment Standard in 40CFR			If Required Method insert proper 5-letter code	USPCI acceptance #
				268.41(a)	268.42 (a)	268.43 (a)		
A.	P030	MANIDES	NWW				CHOXD	
B.	P098	MANIDES	NWW				CHOXD	
C.								
D.								
E.								
F.								
G.								
H.								
I.								
J.								
K.								
L.								
M.								
N.								
O.								
P.								

4. ☐ Multi-source leachate F039

Treatment Standards attached
Constituents which are applicable are marked

NOTE: "Wastewater" means a waste containing less than 1% filterable solids and less than 1% T.O.C.

5. Deadline Extensions

Certain LDR restricted wastes are permitted to be placed in a land disposal unit after the deadline provided they meet other applicable conditions. Restricted wastes which qualify for a deadline extension are as follows:

Check applicable date:

List waste codes for which extension applies

- ☐ November 8, 1990
☐ May 8, 1992
☐ Other: please provide date

ATTACHMENT I



P.O. Box 1712
Richmond, CA 94802-1712
(510) 232-7193
FAX (510) 232-7629

June 12, 1992

Rheeta Dinoian
USPCI, Inc.
30083 Ahern Avenue
Union City, CA 94587

Dear Rheeta,

After reviewing our records and asking you to review your records, it was discovered that the attached manifest did not have a land ban certificate.

Please file the attached land ban certificate with the appropriate manifest in your records.

If you have any questions, you may call me at (510) 232-7193.

Sincerely,

A handwritten signature in dark ink, appearing to read "Lucia Lane". The signature is fluid and cursive, with a long, sweeping underline.

Lucia Lane
Plant Chemist

ATTACHMENT J

HAZARDOUS WASTE LOG 1992

Shipping Date	Manifest Number	Waste(s) Shipped	Land Ban Certificate?
1/29/92	90053420	Sandblasted Grit; Flyash	Yes
3/24/92	90053440	Solvent	Yes
3/26/92	90053421	Flyash; Spent Acid Sludge and Sand; Mixture of dirt, sulfur, spent acid	Yes
4/1/92	89717176*	Used oil for recycle	Not required
6/11/92	91518960*	Used oil for recycle	Not required
9/12/92	90439769	Asbestos	Not required
9/17/92	92092838*	Used oil for recycle	Not required
10/30/92	90439781	Asbestos	Not required
12/2/92	90053439	Used solvent	Yes
12/9/92	92098101*	Used oil for recycle	Not required

*Manifest generated by Evergreen Oil Recyclers

ATTACHMENT K

CONTRA COSTA COUNTY
HEALTH SERVICES DEPARTMENT
ENVIRONMENTAL HEALTH DIVISION
 AB 2185 / SARA TITLE III
HAZARDOUS MATERIALS RELEASE RESPONSE AND INVENTORY LAW
BUSINESS PLAN 3/93

BUSINESS		INFORMATION	
Site Business Name <u>General Chemical Corporation</u>	Invoice Street <u>525 Castro Street</u>	P.O. Box <u>1712</u>	Phone <u>(510) 232-7193</u>
Site Street <u>525 Castro Street</u>	City <u>Richmond</u>	State <u>CA</u>	Zip <u>94802</u>
City <u>Richmond</u>	State <u>CA</u>	Zip <u>94801</u>	Invoice Contact <u>Robert B. Jewett</u>
Type of Business <u>Chemical Manufacture</u>	Parent Company <u>General Chemical Corporation</u>		
Phone <u>(510) 232-7193</u>	Date of Ownership <u>5/86</u>	Street <u>90 East Halsey Rd.</u>	Phone <u>(201) 515-0900</u>
Owner/Operator <u>General Chemical Corporation</u>	City <u>Parsippany</u>	State <u>NJ</u>	Zip <u>07054</u>
SIC Code <u>2819</u>	Dun & Bradstreet No. <u>02-991-2755</u>	Reporting Period <u>March 1</u>	19 <u>93</u> to <u>Feb 28</u> 19 <u>94</u>
Number of Employees <u>34</u>			

PURPOSE OF SUBMITTAL	
<input type="checkbox"/> First filing of a Business Plan <input checked="" type="checkbox"/> Yearly Chemical Inventory <input type="checkbox"/> Change of Business Address <input type="checkbox"/> Change of Business Owner <input type="checkbox"/> Change of Business Name	<input type="checkbox"/> Report of Previously Undisclosed Hazardous Materials <input type="checkbox"/> Report of 100% or More Increase in Quantity of a Previously Disclosed Material <input checked="" type="checkbox"/> Business Plan Update, Change or Certification <input type="checkbox"/> Other (please explain) _____ _____

Hazardous Materials/Occupational Health 4333 Pacheco Blvd. Martinez, CA 94553 (510) 646-2286	FOR COUNTY USE ONLY	FOR FIRE DEPT. USE ONLY
	Site I.D. _____ Date Received _____ Invoice Number _____ Credit Memo _____ Rebill _____ Date Entered _____ C.C.F.D. _____	F.D. # _____ Station # _____ Date _____

Entry #	Maximum amount at any one time (c.f./gls. etc. etc.)	Maximum amount at any one time (convert to pounds)	Average daily amount (in lbs.)	# Days on site	L a w	Chemical Name / Mixture (Do Not Include MSDSs)	Chemical common name	Mixture or Hazardous Waste Composition by % amount If a waste then include the estimated annual amount
1	14,000 cf	5,000	5,000	365	B	SULFUR DIOXIDE GAS		12% SO ₂ - 88% INERT
2	10,000 cf	5,000	5,000	365	B	SULFUR TRIOXIDE GAS		6½% SO ₃ - 93% INERT
3	487,000 GAL	7,400,000	3,200,000	365	B	SULFURIC ACID		H ₂ SO ₄ 93% - 99%, 1%-7% H ₂ O
4	53,300 GAL	800,000	600,000	365	B	SULFUR		
5	4,600,000 GAL	7,000,000	1,600,000	365	B	SPENT SULFURIC ACID	ALKYLATION ACID	H ₂ SO ₄ 91%, HYDRO CARBONS 0-5%
6	90,000 GAL	1,400,000	600,000	365	B	OLEUM	FUMING SULFURIC ACID	20-35% SO ₃ - 65-80% H ₂ SO ₄
7	13,000 GAL	170,000	80,000	365	B	SODIUM HYDROXIDE	CAUSTIC SODA	25% NACH - 75% H ₂ O
8	300 CUFT	15,000	10,000	365	B	SODIUM CARBONATE	SODA ASH	
9	1,000 GAL	15,000	10,000	365	B	NITROGEN		
10	70 GAL	600	400	365	S	KYLENE		
11	70 GAL	600	400	365	S	PETROLEUM NAPHTHA	SOLVENT	
12	53,000 CUFT	48,000	48,000	365	S	VANADIUM PENTOXIDE	VK-38-AX CATALYST	V ₂ O ₅ - 7% INERT 93%
13	700 CUFT	10,000	10,000	365	S	ASH	BOILER FLY ASH	TOTAL WASTE 25,000 LB/YR CONTAINS 1% CHROME & LEAD 99% IN
14	165 GAL	1,400	900	365	S	PETROLEUM OIL	CHEVRON GST OIL 32	HYDROCARBON BLEND
15	110 GAL	900	600	365	S	PETROLEUM OIL	CHEVRON CST OIL 100	HYDROCARBON BLEND
16	110 GAL	900	600	365	S	PETROLUFM OIL	UNIVERSAL GEAR LUBE	HYDROCARBON BLEND
17	30 GAL	300	200	365	S	SODIUM SULFATE	DEARBORN G6	95% SODIUM SULFATE, 5% INERT
18	75 GAL	600	300	365	S	SODIUM PHOSPHATE BLEND	DEARBORN 218	SODIUM PHOSPHATE 75%
19	100 GAL	1,000	500	365	S	MICROBIOCIDE	DEARSHIDE 702	
20	800 GAL	8,200	4,600	365	S	POLYMER MIXTURE	POLEMOR 320	
21	1,000 GAL	8,000	5,000	365	S	BLEND OF HYDROCARBONS	UNLEADED GASOLINE	STANDARD BLEND
	TOTAL :							

(See instructions and use additional lines for comments and attach additional inventory sheets as required.)

INVENTORY-first page (Trade secret information should be submitted on separate yellow sheet and labeled as a TRADE SECRET) Site ID 16644

[illegible]

(See instructions and use additional lines for comments and attach additional inventory sheets as required.)

INVENTORY-second page (Trade secret information should be submitted on separate yellow sheet and labeled as a TRADE SECRET) site ID

Entry #	California Waste Category	Chemical Abstract Service # (CAS)	DOT #	Pure/Mixture (P,M)	Phys. State (S,L,G)	Physical/Health Characteristics					Storage Code	Pres. Code	Temp. Code	Location Code (on layout or diagram)	Location Description	N F P A
						F	P	R	A	C						
1	N/A	007746-09-5	1079	M	G				X		R	1	4		PROCESS GAS	
												3	5		UBIQUITOUS	
2	N/A	007746-11-9	1829	M	G				X		R	1	4		PROCESS GAS	
												3	5		UBIQUITOUS	
3	N/A	007664-93-9	1830	M	L				X		A	1	4	3		
											Q	1	4			
											M	1	4			
											R	1	4		UBIQUITOUS	
											R	2	5		UBIQUITOUS	
4	N/A	007704-34-9	1350	P	L	X			X		A	1	5	4		
											B	1	5			
5	N/A	007664-93-9	1832	M	L	X			X		A	1	4	5		
6	N/A	008014-95-7	1831	M	L				X		A	1	4	6	PROCESS	
											R	1	4		UBIQUITOUS	
7	N/A	001310-73-2	1824	P	L				X		A	1	4	7		
8	N/A	000497-19-8		P	S				X		J	1	4	8		
9	N/A	007727-37-9	1977	P	L		X		X		A	2	7	9		
10	N/A	001330-20-7	1307	P	L	X			X		D	1	4	10		
11	N/A	008030-30-6	1255	P	L	X			X		D	1	4	11		
12	N/A	001314-62-1	2862	M	S				X		A	1	4	12		

Entry #	California Waste Category	Chemical Abstract Service # (CAS)	DOT #	Pure/Mixture (P,M)	Phys. State (S,L,G)	Physical/Health Characteristics					Storage Code	Pres. Code	Temp. Code	Location Code (on layout or diagram)	Location Description	H F P A
						F	P	R	A	C						
13	571			M	S				X	X	1	1	4	13		
											E	1	4			
14	N/A		1270	M	L	X			X		D	1	4	14		
15	N/A		1270	M	L	X			X		D	1	4	14		
16	N/A		1270	M	L	X			X		D	1	4	14		
17	N/A	007757-83-7		M	S				X		1	1	4	15		
18	N/A			M	L				X		D	1	4	16		
19	N/A	007758-29-4	9147	M	S				X		1	1	4	17		
		007601-54-9	9148	M	S				X		1	1	4	17		
20	N/A			M	L				X		D	1	4	18		
21	N/A	008006-61-9	1203	M	L	X			X	X	B	1	4	19		
22	N/A	008006-61-9	1203	M	L	X			X	X	B	1	4	19		
23	221			M	L	X				X	D	1	4	20		
24	343			M	L	X			X		D	1	4	21		
25	N/A	74-86-2	1081	P	6		X		X		L	2	4	22		
26	N/A	7782-44-7	1072	P	6		X		X		L	2	4	23		

SITE LAYOUT AND FACILITY DIAGRAMS:

This document is required in all Business Plans.
See the instructions for an outline of this document.
Check the box which describes your current submission.

- ☐ This is a first time filing of this document.
☐ This is a confirmation of a previous document,
no changes were necessary.
☒ This is a submission of a revised document.

EMERGENCY RESPONSE PLANS AND PROCEDURES:

This document is required in all Business Plans.
See the attached outline included with instructions.
Check the box which describes your current submission.

- ☐ This is a first time filing of this document.
☒ This is a confirmation of a previous document,
no changes were necessary.
☐ This is a submission of a revised document.

EMPLOYEE TRAINING PROGRAM:

This document is required in all Business Plans.
See the attached outline included with instructions.
Check the box which describes your current submission.

- ☐ This is a first time filing of this document.
☒ This is a confirmation of a previous document,
no changes were necessary.
☐ This is a submission of a revised document.

EMERGENCY CONTACTS:

Primary

Name ROBERT JEWETTBusiness Phone (510) 232-7193Job Title PLANT MANAGERAfter Hours Phone (510) 234-9740

Secondary

Name AL STONERBusiness Phone (510) 232-7193Job Title OPERATIONS SUPERVISORAfter Hours Phone (510) 370-9448**DECLARATION CERTIFICATION:**

Positive declaration

- ☒ I hereby certify that the information contained in this Business Plan is accurate, that the plan meets the requirements of chapter 6.95 (section 25500 et. seq.) of the Health and Safety Code, SARA Title III Federal Law, any local laws and regulations, and any amendments and revisions to these laws will be submitted in accordance with that chapter, and that I am authorized to make this certification on behalf of the above named business.

Negative declaration

- ☐ I hereby certify that this business does not have hazardous materials in reportable amounts.

Signature: 

Title

PLANT MANAGER

Name Printed or Typed

ROBERT B. JEWETT

Date

2/26/93**BUSINESS PLAN PREPARATION:**Preparer's Name (s) AL STONER Phone (510) 232-7193

Consulting Firm & Addr. _____ Phone _____

ACUTELY HAZARDOUS MATERIALS REGISTRATION FORM

THIS FORM MUST BE COMPLETED BY THE OWNER OR OPERATOR OF EACH BUSINESS IN CALIFORNIA WHICH AT ANY TIME HANDLES ACUTELY HAZARDOUS MATERIAL IN QUANTITIES GREATER THAN 500 POUNDS, 55 GALLONS OR 200 CUBIC FEET OF GAS AT STP. SUBMIT THIS FORM TO YOUR LOCAL ADMINISTERING AGENCY. (§25533 & 25536 Health & Safety Code)

Note instructions on reverse

Business Name GENERAL CHEMICAL CORPORATION

Business Site Address 525 CASTRO STREET, RICHMOND, CA 94801

Business Mailing Address (if different) P.O. BOX 1712, RICHMOND, CA 94802

Business Phone (510) 232-7193 Business Plan Submission Date¹ SENT 02/93

Process Designation² _____

ACUTELY HAZARDOUS MATERIALS HANDLED³

-USE ADDITIONAL PAGES IF NECESSARY-

<u>CHEMICAL NAME</u>	<u>QUANTITY</u>
<u>SULFUR DIOXIDE</u>	<u>5,000 LBS</u>
<u>SULFUR TRIOXIDE</u>	<u>5,000 LBS</u>
<u>SULFURIC ACID (INCLUDES OLEUM & SPENT SULFURIC ACID)</u>	<u>15,800,000 LBS</u>
<u>VANADIUM PENTOXIDE</u>	<u>50,000 LBS</u>
_____	_____
_____	_____

GENERAL DESCRIPTION OF PROCESSES AND PRINCIPAL EQUIPMENT⁴:

SEE ATTACHED SHEET

SIGNATURE  TITLE PLANT MANAGER

PRINTED NAME ROBERT B. JEWETT DATE 2/26/93

AB2185/SARA TITLE III EMERGENCY RESPONSE AND EVACUATION PLAN/EMPLOYEE TRAINING PROGRAM CHECK LIST

Business Name GENERAL CHEMICAL CORPORATION Site ID # 16644
Site Address 525 CASTRO STREET, RICHMOND, CA 94801 Date _____

Emergency response plans and procedures as well as employee training are required to be reported by hazardous materials handlers. These documents are to be included in the AB2185 Business Plans. The list below is intended to serve as a template or check sheet so that any business that is required to produce and maintain these documents will have a beginning reference. The page # refers to that page number in your Business Plan that contains the item in the check sheet. Larger more complex facilities should summarize these programs by documenting those personnel responsible for these plans and how they can be contacted; they must also provide a summary of the plans' structure and where the more detailed programs are located on the facilities for review by inspecting personnel.

I. NOTIFICATION/ ALARM PROCEDURES

Business Plan
Page Number

- | | |
|---|----|
| A. Call 911 | P1 |
| 1. Notify local fire department or public emergency response agency. | P1 |
| 2. Notify medical emergency response. | P1 |
| B. Notify on site response personnel. | P1 |
| C. Activate local alarm systems. | P1 |
| D. Notify Contra Costa County Health Services Department (646-1112). | P1 |
| E. Notify State Office of Emergency Services (800-852-7550). | P1 |
| (If the spill involves a waste material then notify State Dept. of Health Services, also) | |
| F. Submit a written follow-up spill notification to the State O.E.S.
and the County Health Services Department. | P1 |

II. EVACUATION

- | | |
|---|---|
| A. Procedures for evacuation which include initiating the alarm, area evacuations,
building evacuations and facility evacuations. | Evac. Plan and
RCRA Contingency Plan |
| B. Define routes of evacuations..... | " " |
| C. Identify assembly areas..... | " " |
| D. Identify where emergency response and evacuation plans are posted..... | " " |
| E. Procedures for re-entry..... | " " |

III. EMERGENCY EQUIPMENT

- | | |
|---|--------------------------------------|
| A. Describe all emergency response equipment, its location and its use..... | RCRA Contingency
Plan & SPCC Plan |
|---|--------------------------------------|

IV. EMERGENCY RESPONSE PROCEDURES

- | | |
|--|---------------------------------|
| A. Provide procedures for the handling of a hazardous material release or threat
of a release for all materials listed in the chemical inventory..... | SPCC & RCRA
Contingency Plan |
| B. List all emergency contact personnel. These people must have:..... | " " |
| 1. Technical knowledge and familiarity of that part of the facility that they
are responsible for during an emergency. | |
| 2. Full access to this facility. | |
| 3. Authority to make decisions during an emergency. | |

CHECK LIST (CONT)

V. EMPLOYEE TRAINING REQUIREMENTS

Business Plan
Page Number

- | | |
|--|-----------|
| A. All personnel are trained in safety and emergency response procedures within six months of hiring. _____ | P6 |
| B. Refresher training is provided annually. _____ | P7 |
| C. All employees are trained and drilled in the following: | |
| 1. Procedures for internal alarms and on-site notification of emergencies _____ | P6 |
| 2. Procedures for emergency response notification off-site. _____ | P6 |
| 3. Location and content of facility emergency response plan. _____ | P6 |
| 4. Evacuation and re-entry procedures. _____ | P6 |
| 5. Procedures for chemical spill mitigation. _____ | P6 |
| D. Hazardous material handlers are trained in the following: | |
| 1. Safe methods for storage and handling of these materials _____ | P6 |
| 2. Proper fitting and use of personal protective equipment. _____ | P6 |
| 3. Proper use and locations of fire and spill control equipment _____ | SPCC Plan |
| 4. Knowledge of specific hazards of each chemical to which employees may be exposed. Use the information available from material safety data sheets and any other relevant sources of information. _____ | P7 |
| E. Emergency response team personnel are trained (addition to the above) in the following: | N/A |
| 1. Rescue and containment procedures. _____ | " |
| 2. Procedures for shutdown of operations _____ | " |
| 3. Use and maintenance of emergency equipment. _____ | |

VI. EMPLOYEE TRAINING DOCUMENTATION

- | | |
|---|------------|
| A. List the names and telephone numbers of facility personnel responsible for training employees. _____ | Appendix D |
| B. Training records must include the following: | |
| 1. Training verification (i.e. date and signatures) _____ | Appendix D |
| 2. Description of introductory and continuing training (e.g. type and amount). _____ | P7 |
| 3. Training records to be retained for three years (or longer based on other laws) _____ | P7 |
| 4. Documentation must be available on-site for review by administering agency inspection personnel. _____ | P7 |

ATTACHMENT L

MODEL MULTI-MEDIA SCREENING CHECKLIST

RCRA

Observations

1. Does the facility generate or otherwise handle hazardous wastes? _____

2. Do you see any containers of hazardous waste, land disposal units, lagoons, treatment units? Approximately how many? _____

3. Were any of the units that contain or handle hazardous wastes (containers, berms, dikes, tanks, piping, impoundments, etc.) in poor condition, unmarked, open, leaking, cracked, corroded, or in a condition that would allow the release or potential release of hazardous wastes? If yes, describe unit(s). Any actual or evidence of past releases observed? If so, describe waste (i.e., liquid, sludge, etc.), unit(s), and location.

4. Does the facility operate a boiler or industrial furnace which burns hazardous wastes? Was there any incineration of hazardous waste on site?

5. Was there any evidence of spills, leaks, or discharges of hazardous wastes? If so, provide location and description.

Interview Questions/Records Review

1. If the facility is a generator of hazardous waste was there a notification of hazardous waste activity? What is the quantity (kilograms/month) of hazardous wastes produced? How are they produced?

2. What is the EPA Identification Number? _____

UST

Observations

1. Are there any underground storage tanks? ONLY PRODUCT TANKS; NO - GASOLINE + DIESEL
2. Approximately how many? What are the contents? (Wastes, virgin petroleum, or chemicals)

NOT ADDRESSED

3. What type of leak detection is used? When was it last used?

4. Is there any evidence of leaks, spills, broken piping, broken fill/vent lines, or leaking pumps joints or valves? Provide location and description.

Interview Questions/Records Review

1. If the tanks are for virgin petroleum or chemicals (not wastes) are they registered with the state? Date of registration? Date of tank(s) installation?

WETLANDS

Observations

1. Are there any wet areas near the facility with wetland-type vegetation (cattails, rushes, sedges) that have been disturbed by waste disposal, ditching, or filling?

NOT ADDRESSED

Interview Questions/Record Reviews

1. Does the facility have a federal section 404 permit or any state or local permit authorizing the fill?

AIR

Observations

1. Is there any asbestos on site? NOT ADDRESSED
2. Is the facility undergoing or has the facility undergone any renovations or demolitions during the last 18 months which involve the removal or disturbance of asbestos-containing materials? Approximately how much asbestos (square feet or linear feet) was removed?

3. Does the facility have any coating or printing operations? Does the facility use any paints or organic solvents? What, if any, type of air pollution control is used? Was it operating?

YES - ORGANIC SOLVENTS

ABATEMENT UNIT IS UTILIZED

4. Were there any odors? What process was the source of the odors? Describe the odors.

STRONG SULFUR ODORS

5. Were there any visible (opaque smoke) emissions? What process was the source? Were there any fugitive (not from a stack) emissions? Was the air pollution control equipment, if any, operating? Describe source.

NOT ADDRESSED

Interview Questions/Records Reviews

1. If asbestos was removed was notification provided to the State and EPA?
2. If the facility has coating or printing operations are they water based or organic solvent based?

CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
(Insert name and address of Cal/EPA Board/Department)

INTERAGENCY REFERRAL

An inspection was made by a representative of this Board/Department on the date and at the location indicated below. During the course of our inspection, the following conditions were noted which your Board/Department or Agency may wish to investigate.

REFERRED TO:

Name of Board/Department or Agency: _____

Complete address: _____

Telephone number: _____

Attention: _____

_____ Please advise of your disposition of this matter

LOCATION/FACILITY INSPECTED

Facility/owner's name: _____

Complete address: _____

Telephone number: _____

Occupant's name: _____

Permit/identification number (e.g., EPA generator ID, wastewater discharge permit, etc.), if available: _____

Inspector: _____ Telephone number: _____

Inspection date: _____ Referral date: _____

Violations/Conditions noted: _____

Assistant Secretary for Law Enforcement
555 Capitol Mall, Suite 235
Sacramento, CA 95814
Tel. (916) 327-2064
Fax (916) 322-6005

California Air Resources Board
Compliance Division
2020 L Street
Sacramento, CA 95814
Tel. (916) 322-6022
Fax (916) 445-5745

California Integrated Waste Management Board
Permitting and Compliance Division
880 Cal Center Drive
Sacramento, CA 95826
Tel. (916) 255-2431
Fax (916) 255-2574

Department of Toxic Substances Control
400 P Street, 4th Floor
Sacramento, CA 95812

Criminal Investigations Branch
Tel. (916) 324-2448
Fax (916) 323-5542

Surveillance and Enforcement Branches:

Region 1 (Sacramento)	Region 2 (Berkeley)
Tel. (916) 255-3549	Tel. (510) 540-3860
Fax (916) 255-3595	Fax (510) 540-5907

Region 3 (Glendale)	Region 4 (Long Beach)
Tel. (818) 551-2816	Tel. (310) 590-5950
Fax (818) 551-2901	Fax (310) 590-5907

Toxic Hotline 1-800-69-TOXIC

Department of Pesticide Regulation
Pesticide Enforcement Branch
1220 N Street
Sacramento, CA 95814
Tel. (916) 654-0831
Fax (916) 654-1427

Field Offices:

Anaheim (714) 680-7903	Berkeley (510) 540-2910
Fresno (209) 445-5401	Sacramento (916) 445-6983

Office of Environmental Health Hazard Assessment
601 North 7th Street
Sacramento, CA 94234-7320
Tel. (916) 324-7572
Fax (916) 327-1097

North Coast Region (1)
5550 Skylane Blvd., Ste. A
Santa Rosa, CA 95403
Tel (707) 576-2200
Fax (707) 523-0135

San Francisco Bay Region (2)
2101 Webster Street, Ste. 500
Oakland, CA 94612
Tel (510) 286-0515
Fax (510) 286-1380

Central Coast Region (3)
81 Higuera Street, Ste. 200
San Luis Obispo, CA 93401-5414
Tel (805) 543-0397
Fax (805) 543-0397

Los Angeles Region (4)
101 Centre Plaza Drive
Monterey Park, CA 91754-2155
Tel (213) 266-7510
Fax (213) 266-7600

Central Valley Region (5)
3443 Routier Road
Sacramento, CA 95827-3098
Tel (916) 255-3039
Fax (916) 255-3015

Lahontan Region (6)
2092 Lake Tahoe Blvd., Ste. 2
South Lake Tahoe, CA 96150
Tel (916) 544-3481
Fax (916) 544-2271

Colorado River Basin Region (7)
73-720 Fred Waring Drive, Ste. 10
Palm Desert, CA 92260
Tel (619) 346-7491
Fax (619) 341-6820

Santa Ana Region (8)
2010 Iowa Avenue, Ste. 100
Riverside, CA 92507-2409
Tel (909) 782-4130
Fax (909) 781-6288

San Diego Region (9)
9771 Clairemont Mesa Blvd., Ste. F
San Diego, CA 92124
Tel (619) 467-2952
Fax (619) 571-6972

Prosecutors (e.g., U.S. Attorney, Attorney General, City/
District Attorney, etc.)

Other State/Local Enforcement Agencies (e.g., CHP, FBI,
air district, county health, etc.)

ENVIRONMENTAL ASSESSMENT

1. Is there any evidence of environmental impacts that haven't been addressed? Possible examples include:

- additional evidence of spills, leaks
- vegetation damage in the surrounding area
- odors in the surrounding neighborhood
- neighborhood covered with "dusts"
- poor water quality in streams near the facility

SULFUR LEAKS, SPILLS

2. Were there situations of possible excessive occupational exposures that should be referred to OSHA?

No

SDWA-UIC

Observations

1. Are there any discharges other than sanitary waste (i.e. industrial wastes) into or onto (including drain fields) the ground? Is a on-site septic disposal system used? Describe the discharges and disposal system.

No

Interview Questions/Records Review

1. Does the facility have or has it had any wells (dug, drilled or driven), dry wells, leachfields, or septic systems? Did they receive(d) commercial or industrial waste (liquid and/or solid), cooling water, or drainage from roof drains, floor drains, or parking lots? If yes, give a description.

2/A

2. Does the facility have a permit?

3. What is the current status of wells (active, abandoned, under construction, repairs)?

4. If the wells are inactive what was the date they were last used?

WATER-NPDES

Observations

1. Does the facility use water in it's manufacturing process?
YES

2. Does the facility discharge to a stream, municipal sewer, or use subsurface disposal?

CONNECTED TO CHEVRON USA REFINERY

3. What process(es) generate wastewater? Is the wastewater treated? Is the effluent clear? Does the treatment plant appear to be maintained (look for rust, dry basins, abandoned equipment, etc.)?

STORM WATER

PIPED TO CHEVRON USA REFINERY

PH = 6

4. Where does the storm water drain to? 4 TANKS FOR NEUTRALIZATION

5. Where do floor drains discharge?

N/A

Interview Questions/Records Review

1. How is the treatment plant's sludge disposed? How is it tested?

NOT ADDRESSED

ATTACHMENT M

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2

700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

GENERATOR INSPECTION CHECKLIST

Facility Name General Chemical ID No. CAD028981967
Facility Address 525 Castro Street, Richmond, CA 94802
Date(s) Inspected 4/26/93 Inspected By Maria Kelly

All items listed below are included in the inspection, unless lined out to indicate the item was not evaluated.

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NOTE:

- o The violations cited below are from California Health and Safety Code, Sections 25100 et seq. and title 22, California Code of Regulations.
- o Check mark notes a Violation.
- o RCRIS violation codes are given in parentheses for each violation (e.g. GOR).

I: WASTE MINIMIZATION

Waste Minimization (See Guidance p. 4)

- 1__ 25244.4 Generator failed to submit a report to the Department at least every two years reporting changes in volume and toxicity achieved through waste reduction.
- 2__ 25244.19 Generated more than 12,000 Kg HW or 12 Kg EHW and failed to conduct a source reduction and evaluation review of their facility and prepare a waste minimization plan.
- 3__ 25244.21 Generator failed to retain current (SB14) review and plan, plan summary, report and report summary at each site and make available for inspection.

II: ILLEGAL OPERATIONS

Hazardous Waste Determination

- 4__ 66262.11 Failed to determine if waste is hazardous by testing the waste or applying knowledge of characteristics. (GGR)

Identification Number

- 5__ 66262.12(a) Generator treated, stored, disposed, transported, or offered for transportation HW without receiving an EPA Identification Number. (GGR)
- 6__ 66262.12(c) Generator offered HW to transporter or TSDF that had not received an EPA Identification Number. (GGR)

Illegal Disposal & Transportation

- 7__ 25189.5(a) Disposed or caused disposal of HW at unauthorized point. (GGS)
- 8__ 25201(a) Disposed HW without a permit or authorization. (GGS)
- 9__ 25163(a) Transported HW or transferred HW to a transporter without valid registration. (GOR)

10__ 66263.23(b) Caused transportation of HW to an unauthorized point. (GOR)

Illegal Storage & Treatment

- 11__ 25201(a) Storage of on-site HW in tanks or containers greater than 90 days without a permit or authorization. (GGS)
- 12__ 25201(a) Storage of on-site HW in tanks exceed 5,000 gal/45,000 lb. or aggregate 50,000 gal without permit or authorization. (GGS)
- 13__ 25201(a) Storage of off-site HW in tank or containers for any time without permit or authorization. (GGS)
- 14__ 25201(a) Storage of on-site HW in containers less than 5,000 gal and the aggregate exceeds 50,000 gal (not tanks) without permit or authorization. (GGS)
- 15__ 25201(a) Storage of HW other than containers or tanks without permit or authorization. (GGS)
- 16__ 25201(a) Storage of HW at transfer facility greater than 144 hours without permit or authorization. (GGS)
- 17__ 25201(a) Treatment of hazardous waste without a permit or authorization. (GGS)
- 18__ 67430.1(a) Failed to handle or dispose extremely HW pursuant to Extremely HW Permit issued by the Department. (GOR)

III. WALKTHROUGH OBSERVATIONS

Preparedness and Prevention (See Guidance p. 8)

NOTE: Section 66262.34(a)(3) requires generators who accumulate HW to comply with the following requirements (66265.31-37).

- 19__ 66265.31 Facility not maintained or operated to minimize possibility of fire explosion, or release of HW or HW constituents to air, soil, or surface water which could threaten human health or the environment. (GOR)
- 20__ 66265.32(a) Internal communications or alarm system not provided. (GOR)
- 21__ 66265.32(b) A device (i.e. telephone or two-way radio) capable of calling outside emergency help not provided. (GOR)
- 22__ 66265.32(c) Portable fire extinguishers, fire control equipment, spill control equipment, and/or decontamination equipment not provided. (GOR)
- 23__ 66265.32(d) Adequate water, foam producing equipment, or automatic sprinklers not provided. (GOR)
- 24__ 66265.33 Failed to test and maintain all communications or alarm systems, fire protection, spill control, or decontamination equipment. (GOR)
- 25__ 66265.34 No immediate access to emergency communication and/or alarm system during HW handling. (GOR)
- 26__ 66265.35 Failed to maintain adequate aisle space. (GOR)
- 27__ 66265.37 No arrangements made with police, fire department, emergency response, local hospital, Office of Emergency Service, and/or emergency response contractors. (GOR)

Use and Management of Containers (See Guidance p. 7-8)

NOTE: Section 66262.34(a)(1) requires generators who accumulate HW in containers to comply with the following requirements (66265.171-177).

- 28__ 66265.171 Failed to transfer HW from containers not in good condition or leaking to containers in good condition. (GOR)
- 29__ 66265.172 Failed to use container or liner that was compatible with HW to be stored or transferred. (GOR)
- 30__ 66265.173(a) Failed to keep containers of HW closed except when adding or removing HW. (GOR)

- 32__ 66265.173(b) Handled container of HW in a manner which may cause it to rupture or leak. (GOR)
- 32__ 66265.174 Failed to inspect areas where containers are stored or transferred at least weekly, looking for leaking containers and deterioration of containers and containment system. (DGS)
- 33__ 66265.176 Failed to locate ignitable or reactive waste at least 15 meters (50 feet) from the facility's property line. (GOR)
- 34__ 66265.177(a) Incompatible wastes or wastes and materials were placed in the same container without complying with 66265.17(b). (GOR)
- 35__ 66265.177(b) Placed HW in unwashed container that previously held incompatible waste or material. (GOR)
- 36__ 66265.177(c) Container of HW which was incompatible with any other waste or material stored nearby in other containers, tanks, waste piles, or surface impoundments was not separated or protected by a berm or other device. (GOR)

Pre-Transport Requirements (See Guidance p. 7)

- 37__ 66262.30 Failed to package HW per DOT (49 CFR Parts 173, 178, 179) before offering HW for transportation off-site. (GPT)
- 38__ 66262.31 Failed to label each package of HW per DOT (49 CFR Part 172) before offering HW for transportation off-site. (GPT)
- 39__ 66262.32 Failed to mark each package of HW with shipping name, ID#, ORM designation (label <110 gal) per DOT (49 CFR Part 172) before offering HW for transportation off-site. (GPT)
- 40__ 66262.33 Failed to ensure the transport vehicle is correctly placarded per DOT (49 CFR Part 172, Subpart F) for hazardous materials before offering HW for transportation off-site. (GPT)
- 41__ 66262.34(e)(1) Accumulated HW in containers at point of generation (i.e. satellite accumulation areas) beyond quantity or time limits. (GPT)
- 42__ 66262.34(e)(3) Failed to mark container of HW at point of generation (i.e. satellite accumulation area) with date quantity limit reached within 3 days. (GPT)
- 43__ 66262.34(f)(1) Failed to mark generation start date begins on each container and portable tank in the 90-day accumulation area. (GPT)
- 44__ 66262.34(f)(2) Failed to mark the date 100 kg/1 kg period begins for each container and tank in the 90-day accumulation area. (GPT)

- 45___ 66262.34(f)(3) Failed to label each container and tank of HW with works "Hazardous Waste". (GPT)
- 46___ 66262.34(f)(3) Failed to label containers and portable tanks of HW with composition and physical state of HW, hazardous properties, and name and address of generator. (GPT)

Empty Containers

- 47___ 66261.7(f) Container or inner liner > 5 gal. not marked with date emptied and managed pursuant to 66261.7(e) within one year of date emptied. (GOR)
- 48___ 66261.7(p) Containers or inner liners of containers containing HW which are not empty are not managed as HW. (GOR)

Tanks (See Guidance p.9)

NOTE: Section 66262.34(a)(1) requires generators who accumulate HW in tanks to comply with the following requirements (66264.191-199).

Existing systems (installed before 7/14/86):

- 49___ 66265.191(a) Failed to determine whether tank is leaking or unfit and keep written integrity assessment certified by registered professional engineer for tanks without secondary containment. (GOR)
- 50___ 66265.191(b) Assessment failed to determine whether tank system is adequately designed, of sufficient structural strength, and compatible with HW. (GOR)
- 51___ 66265.191(d) If found to be leaking or unfit for use, failed to comply with 66265.196. (GOR)

New tank systems (installed after 7/14/86):

- 52___ 66265.192 Failed to obtain or retain on-site the required written assessment and certification statements for design and installation of new tank systems. (GOR)
- 53___ 66265.193 Failed to provide required secondary containment. [refer to guidance document for compliance dates] (GOR)
- 54___ 66265.194(a) Placed HW or treatment reagents in tank system which caused the tank, containment system or ancillary equipment to leak, corrode, rupture, or fail. (GOR)
- 55___ 66265.194(b) Failed to use controls and practices to prevent spillage and overflows from tank system. (GOR)
- 56___ 66265.194(b)(3) Failed to maintain sufficient freeboard (60 cm/2 ft) in uncovered tanks to prevent overtopping. (GOR)

- 57 — 66265.195(a) Failed to conduct daily inspection of tanks for following: discharge control equipment, corrosion, releases, monitoring and leak detection data, construction materials and secondary containment areas, and level of waste in uncovered tanks. (GOR)
- 58 — 66265.195(b) Failed to inspect cathodic protection systems (if present) and sources of impressed current as appropriate. (GOR)
- 59 — 66265.196 Failed to remove from service immediately a tank system or secondary containment system that had leaked or spilled. (GOR)
- 60 — 66265.197 During closure of tank system, failed to remove or decontaminate all waste residues, contaminated tank system, soils, and manage them as HW. (GOR)
- 61 — 66265.198(a) Stored or treated in tanks ignitable or reactive waste so as to cause the waste to ignite or react. (GOR)
- 62 — 66265.198(b) Failed to comply with buffer zone requirements for tanks containing ignitable or reactive wastes per NFPA "Flammable and Combustible Liquids Code. (GOR)
- 63 — 66265.199(a) Stored incompatible wastes in same tank without complying with 66251.17(b). (GOR)
- 64 — 66265.199(b) Placed HW in non-decontaminated tanks that previously held an incompatible waste or material without complying with 66251.17(b). (GOR)

Ignitable, Reactive, or Incompatible Wastes

NOTE: The following requirement applies to generators per 66265.177(a) for containers and 66265.199(a)&(b) for tanks.

- 65 — 66265.17(b) Failed to conduct transfer, storage, treatment, or disposal of ignitable or reactive wastes / mixture or commingling of incompatible wastes/materials to prevent:
- (1) Generation of extreme heat or pressure, fire or explosion, or violent reaction.
 - (2) Production of uncontrolled toxic mists, fumes, dusts or gases to threaten human health or environment.
 - (3) Production of uncontrolled flammable fumes or gases to pose risk of fire or explosions.
 - (4) Damage to structural integrity of HW containment devices.
 - (5) Threat to human health or the environment. (GOR)

Recyclable Materials (See Guidance p. 3)

- 66__ 25250.7 Intentionally contaminated used oil with other HW. (GOR)
- 67__ 66266.81(b) Damaged lead acid batteries not properly managed and labelled. (GOR)

Used Oil

- 68__ 25250.5(a) Disposed of used oil by discharge to sewers, drainage systems, water, incineration, or burning as fuel, or disposal on land without authorization. (GOR)
- 69__ 25250.5(b) Used Oil, recycled oil, or oil exempt was used as dust suppressant and failed to meet applicable standards. (GOR)
- 70__ 25250.7 Intentionally contaminated used oil with other hazardous waste, other than small amounts of vehicle fuel. (GOR)
- 71__ 66266.130(c)(6) Failed to manage used oil separated from used oil filters as HW. (GOR)

IV. DOCUMENT REVIEW

Manifest System (See Guidance p. 10)

- 72__ 66262.20(a) Failed to prepare a complete manifest for HW transported or sent off-site. (GMR)
- 73__ 66262.20(b) Failed to designate on the manifest a facility which is authorized to handle the HW. (GMR)
- 74__ 66262.23(a)(1)(2) Manifest not properly completed, signed or dated. (GMR)
- 75__ 66262.23(a)(4) Generator manifest copies not sent to Department within 30 days of each shipment of HW. (GMR)
- 76__ 66262.23(b) Failed to give manifest copies to transporter. (GMR)
- 77__ 25160(b)(3) For out-of-state shipments, failed to submit TSDF manifest to the Department signed by all transporters (except rail transporters) and out-of-state facility operator within 30 days. (GMR)
- 78__ 66262.42(a) Failed to determine the status of HW when generator did not receive facility manifest copy within 35 days. (GRR)
- 79__ 66262.42(b) Exception Report not sent to Department within 45 days. (GRR)
- 80__ 66262.40(a) Failed to keep signed copy of manifest for 3 years. (GRR)
- 81__ 66263.42(e) Generators failed to keep shipping papers or receipt for milkrun operations for 3 years. (GRR)
- 82__ 66266.81(a)(4)(B) Failed to retain copy of manifest or bill of lading for spent lead acid batteries for 3 years. (GRR)
- 83__ 25250.8(b)(3) Generator failed to retain copies of used oil receipts for 3 years. (GRR)
- 84__ 66266.130(c)(5) Failed to keep bill of lading for used oil filters for 3 years. (GRR)

Land Disposal Restrictions (LDR) (See Guidance p. 11)

- 85__ 66268.7(a) No determination whether waste is restricted from land disposal. (GLB)
- 86__ 66268.7(a)(1) No notification for LDR waste that fails to meet all applicable treatment standards. (GLB) [See note on next page]

NOTE: The notification must include the following:

- a. EPA HW Number, or California Waste Code and Non-RCRA HW (see 66268.29 for list of non-RCRA waste types)
- b. corresponding treatment standards or treatment technologies
- c. manifest number associated with the waste shipment
- d. waste analysis data, where available.

- 87__ 66268.7(a)(2) No signed notice and certification for LDR waste requiring further treatment. (GLB)
- 88__ 66268.7(a)(5) Failed to retain on-site determination/waste analysis records. (GLB)
- 89__ 66268.7(a)(6) Failed to retain notifications, certifications, other records for 5 years. (GLB)

Exports of Hazardous Waste (See Guidance p. 12)

- 90__ 66262.52 Exports of HW prohibited without notification of intent to export, consent of receiving country, and EPA Acknowledgement of Consent. (GCS)
- 91__ 66262.53(b) Exporter of Non-RCRA HW fail to notify Department of intended export 4 weeks prior to shipment. (GCS)
- 92__ 66262.54 Exporter failed to comply with special manifest requirements. (GCS)

Recordkeeping and Reporting

- 93__ 66262.40(c) Waste analysis/test records not kept for at least 3 years. (GRR)
- 94__ 66262.41(a) Biennial Report not sent to the Department. (GRR)
- 95__ 66262.40(b) Copy of Biennial Report / Exception Report not retained for 3 years. (GRR)
- 96__ 66265.77(a) Failed to report releases, fires, and explosions to the Department within 15 days per 66265.56(j). (GRR)
- 97__ 66265.77(b) Failed to report to the Department ground-water contamination and monitoring data per 66265.93 and 66265.94. (GRR)

Contingency Plan and Emergency Procedures (See Guidance p.14)

NOTE: Section 66262.34(a)(3) requires generators who accumulate HW to comply with the following requirements (66265.51-56).

- 98__ 66265.51(a) No contingency plan. (GOR)

- 99___ 66265.51(b) Failure to implement contingency plan whenever there is a fire, explosion, or release of HW which could threaten human health or environment. (GOR)
- 100___ 66265.52(a) Incomplete contingency plan. (GOR)
- 101___ 66265.53(a) Contingency plan not maintained on site. (GOR)
- 102___ 66265.53(b) Contingency plan not submitted to local emergency authorities. (GOR)
- 103___ 66265.54 Contingency plan not amended as necessary. (GOR)
- 104___ 66265.55 No emergency coordinator either on premises or on-call at all times. (GOR)
- 105___ 66265.56 Emergency coordinator failed to immediately implement the emergency procedures. (GOR)
- 106___ 66265.56(j) Facility failed to note required information in operating log and submit written report to the Department within 15 days. (GOR)

Personnel Training (See Guidance p. 16)

NOTE: Section 66262.34(a)(3) requires generators who accumulate HW to comply with the following training requirements (satellite accumulation areas are exempt).

- 107___ 66265.16(a)(1) Personnel failed to complete training course to assure compliance with HW requirements. (GOR)
- 108___ 66265.16(a)(2) Training program was not directed by a person trained in HW procedures and/or not relevant to employees' job duties. (GOR)
- 109___ 66265.16(a)(3) Training program failed to ensure that facility personnel are able to respond to emergencies. (GOR)
- 110___ 66265.16(b) Personnel failed to complete the required training program within 6 months or worked in unsupervised positions prior to completing the training requirements. (GOR)
- 111___ 66265.16(c) Personnel failed to receive an annual review of their initial training. (GOR)
- 112___ 66265.16(d) Failed to maintain all the required training documentation on-site. (GOR)
- 113___ 66265.16(e) Failed to keep training records on current personnel and/or former employees within the last 3 years on-site. (GOR)

V. Transportation [T]

- 114__ 25163(a) Transported HW or transferred HW to a transporter without valid registration. (TRR)
- 115__ 66263.17(a) Transported HW without receiving Identification Number and registration certificate from the Department. (TMR)
- 116__ 25160(d) Transported HW without a manifest. (TMR)
- 117__ 25163(e) Transported HW in vehicle not inspected by CHP. (TRR)
- 118__ 25163(e) Transported HW in container not packaged per DOT. (TRR)
- 119__ 25166(a) Failed to pay HW transporter registration fees. (TRR)
- 120__ 25168.4 Failed to pay annual inspection fee for vehicles. (TRR)
- 121__ 25169(a) Failed to maintain financial public liability to respond to damages during the course of business operations. (TRR)
- 122__ 25169.2(b) Transported HW in vehicle without certificate. (TRR)
- 123__ 25169.3 Transported HW from abandoned site without complying with all conditions. (TRR)
- 124__ 25186.5(b) Filed incomplete or incorrect disclosure statement. (TRR)
- 125__ 25250.8(b)(1) Failed to prepare a manifest for used oil prior to transfer to another transporter. (TMR)
- 126__ 25250.8(b)(4) Failed to fill out used oil receipts attached to manifests. (TMR)
- 127__ 25250.8(b)(5) Failed to enter the volume of used oil on the manifest at delivery, end of day or change of driver. (TMR)
- 128__ 25250.8(b)(6) Failed to submit the generator copy of used oil manifests to the Department within 30 days of each shipment. (TMR)
- 129__ 25250.23 Transported used oil and not registered as a HW hauler. (TRR)
- 130__ 66263.23(e) Failed to have on the side of each vehicle a firm name or trademark which is legible from 50 ft.
- 131__ 66263.23(b) Delivered hazardous waste to an unauthorized facility.

The facility amended its notification form on January 27, 1981 and added vanadium oxide or vanadium pentoxide (EPA Waste Code P120). The certification at the bottom of the January 27, 1981 form states that many of the commercial chemical products listed are laboratory stock or manufactured products and are not normally discarded. According to Mr. Jewett, these laboratory chemicals were used in routine laboratory analysis testing and only a few pounds were generated.

CERCLA HAZARDOUS WASTE SITE NOTIFICATION

On September 18, 1987, a Notification of Hazardous Waste Site form was submitted to EPA, Region IX, in accordance with the requirements of Section 103(c) of the Comprehensive Environmental Response Compensation and Liability Act of 1980 (CERCLA) (Attachment B). The amended notification was necessitated by the discovery of an acidic sludge which had been disposed of on-site. The General Chemical Corporation contact, Edward Shields, Director of Environmental Matters, estimated that this incident of waste disposal occurred in 1969. According to the Notification form, approximately 75,000 cubic feet of acidic sludge had been disposed of on-site. On page 3 of the Notification form, Mr. Shields states that the attached analysis (Table I, page 5) lists organic materials contained in the sludge in concentrations greater than 1%. However, the purpose of Table I is not clear since it references area and not concentrations.

PURPOSE

The purpose of the Compliance Evaluation Inspection (CEI) was to evaluate General Chemical's compliance with the Resource Conservation and Recovery Act (RCRA) and state regulations contained within the State of California's Health and Safety Code and the California Code of Regulations ("Title 22").

Physical Inspection

The inspectors present at the CEI conducted on April 26, 1993 included representatives from EPA, Contra Costa County, and the California Department of Environmental Protection Agency, Department of Toxic Substances (DTSC). Upon arrival at General Chemical, Robert Jewett, the Plant Manager, was notified by EPA of the purpose of the inspection. The inspectors were delayed by one and one half hours by Mr. Jewett before the inspection proceeded.

EPA was denied access to photographic evidence by Mr. Jewett and by Carolyn Lown, the facility's legal representative. Mr. Jewett stated that company policy did not allow photographs to be taken on-site. EPA informed Mr. Jewett that only waste areas